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and Debtor-in-Possession, John Jean Bral

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

11 In re Case No. 8:17-bk-10706-ES
12 JOHN JEAN BRAL, Chapter 11

13 ||| Debtor and
Debtor in Possession.

**FIRST AND FINAL APPLICATION FOR
COMPENSATION AND
REIMBURSEMENT OF EXPENSES OF
PACHULSKI STANG ZIEHL & JONES
LLP AS SPECIAL REORGANIZATION
COUNSEL FOR DEBTOR AND DEBTOR
IN POSSESSION FOR THE PERIOD
JANUARY 1, 2018 THROUGH JULY 31,
2019; DECLARATION OF WILLIAM N.
LOBEL IN SUPPORT THEREOF**

Hearing Date and Time:

Date: November 19, 2019
Time: 2:00 p.m.
Place: Courtroom 5A
411 West Fourth Street
Santa Ana, CA 92701

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1 **TO THE HONORABLE ERITHE A. SMITH, UNITED STATES BANKRUPTCY JUDGE,
2 THE DEBTOR, THE OFFICE OF THE UNITED STATES TRUSTEE, THE DEBTOR'S
3 TWENTY LARGEST UNSECURED CREDITORS, AND PARTIES REQUESTING
4 SPECIAL NOTICE:**

5 Pachulski Stang Ziehl & Jones LLP (the “Firm” or the “Applicant”), special reorganization
6 counsel to John Jean Bral, the above-captioned debtor and debtor in possession, (“Bral” or the
7 “Debtor”), hereby submits this *First and Final Application of Pachulski Stang Ziehl & Jones LLP*
8 for *Interim Allowance and Payment of Compensation and Reimbursement of Expenses* (the
“Application”), for the period of January 1, 2018 through July 31, 2019 (the “Application Period”)
pursuant to sections 330 and 331 of the Bankruptcy Code.¹

9
10 **I. INTRODUCTORY STATEMENT**

11 Local Bankruptcy Rule 2016-1(1)(a) sets forth certain requirements that a professional must
12 satisfy in order to obtain an award for fees and costs. Additional standards to be employed in the
13 review of fee applications are set forth in the United States Trustee's Guidelines for Reviewing
14 Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 (the
15 “Compensation Guidelines”). Finally, cases interpreting sections 330 and 331 of the Bankruptcy
16 Code have required that courts consider the twelve (12) factors that the Ninth Circuit Court of
17 Appeals articulated in Kerr v. Screen Extras Guild, 526 F.2d 67, 70 (9th Cir. 1975), cert. denied,
18 425 U.S. 951, 96 S.Ct. 726 (1976). The Ninth Circuit's primary method used to determine the
19 reasonableness of fees is to calculate the “lodestar.” In re Charles Russell Buckridge, Jr., 367 B.R.
20 191, 201 (C.D. Cal. 2007). The lodestar is ascertained by multiplying the number of hours
21 reasonably expended by a reasonable hourly rate. Law Offices of David A. Boone v. Derham-Burk
22 (In re Eliapo), 468 F.3d 592, 598 (9th Cir. 2006). As set forth more fully herein, this Application
23 complies with all statutory guidelines and Court-imposed requirements.

24 By this Application, Applicant seeks approval and payment of \$1,594,301.50 in fees for the
25 Application Period, and costs in the amount of \$31,846.35, for an aggregate total of \$1,626,147.85.

26
27 _____
28 ¹ All references to sections of the “Bankruptcy Code” are to sections of 11 U.S.C. §§ 101-1532, as
amended. All references to “Bankruptcy Rules” are to the Federal Rules of Bankruptcy Procedure.

2 Firm has not been compensated by the Debtor and does not hold funds in its trust account on behalf
of the Debtor.

Notice of this Application has been served by NEF notice or by first class U.S. mail, as required, on (a) the Debtor, (b) the Office of the United States Trustee, (c) the Debtor's twenty largest unsecured creditors, and (d) parties that have filed with the Court requests for notice of all matters in accordance with Bankruptcy Rule 2002(i).

II. PRELIMINARY SUMMARY OF COMPENSATION DATA FOR THIS APPLICATION [LBR 2016-1(a)(1)(B and (C)]

- 1. ORDER RE EMPLOYMENT ENTERED:** February 21, 2018, with employment effective as of January 1, 2018 [Docket No. 315].
 - 2. PERIOD OF EMPLOYMENT COVERED BY THIS APPLICATION:**
January 1, 2018, through July 31, 2019.
 - 3. HOURS OF PROFESSIONAL TIME WHICH ARE THE SUBJECT OF THIS APPLICATION:** **2,246.80**
 - 4. FEES REQUESTED BY THIS APPLICATION:** **\$1,594,301.50**
 - 5. EXPENSES REQUESTED BY THIS APPLICATION:** **\$31,846.35**
 - 6. AMOUNT OF PRE-PETITION RETAINER RECEIVED BY APPLICANT:**
\$0.00
 - 7. AMOUNT OF FEES AND EXPENSES PREVIOUSLY AWARDED:** **\$0**
 - 8. AMOUNT OF FEES AND EXPENSES PAID POST-PETITION:** **\$0**
BLENDED RATE: \$709.59 (Including Paraprofessionals)
\$768.79 (Excluding Paraprofessionals)

III. BRIEF NARRATIVE HISTORY AND PRESENT POSTURE OF THE CASE
[LBR 2016-1(a)(1)(D)]

This Application covers the Application Period, January 1, 2018 through July 31, 2019, during which the Applicant represented the Debtor in this case.

1 **A. General Background**

2 On February 24, 2017 (the “Petition Date”), the Debtor filed his voluntary petition for relief under
3 chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). The Debtor continued to
4 operate and manage his affairs as a debtor in possession pursuant to sections 1107(a) and 1108 of
5 the Bankruptcy Code. No trustee, examiner, or committee has been appointed in this case.

6 On January 31, 2018, the Debtor filed an Application Pursuant to Sections 327(a), 330, and
7 331 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016 and Local Rules 2014-1 and 2016-
8 1 for an Order Authorizing the Retention of Pachulski Stang Ziehl & Jones LLP as Special
9 Reorganization Counsel to the Debtor, Nunc Pro Tunc to January 1, 2018 [Docket No. 296]. On
10 February 21, 2018, the Court entered its Order Granting Debtor’s Application Pursuant to Sections
11 327(a), 330, and 331 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016 and Local Rules
12 2014-1 and 2016-1 for an Order Authorizing the Retention of Pachulski Stang Ziehl & Jones LLP
13 as Special Reorganization Counsel to the Debtor, Nunc Pro Tunc to January 1, 2018 [Dkt. No. 315].

14 **B. The Background of the Debtor**

15 The Debtor is an individual who holds membership interests in several limited liability
16 companies. The major factor causing the need to file the Case was the pendency of numerous pre-
17 petition litigation matters commenced against the Debtor by his business associate Barry Beitler
18 (“Beitler”) and persons and entities controlled by him. In light of so many cases pending in different
19 forums, the time and expense associated with the litigation, the collection efforts that were
20 undertaken by Beitler and his affiliates, and the prejudice that would have been caused had Beitler
21 obtained charging orders against the Debtor’s membership interests, the Debtor determined it would
22 be in his and his creditors’ best interests to commence this chapter 11 proceeding. The
23 commencement of this Case has provided the Debtor with a breathing spell from the litigation
24 proceeding in numerous forums while the Debtor moves forward in liquidating his membership
25 interests in two limited liability companies (the “LLCs”), either through the dissolution of those
26 LLCs or through the purchase of his membership interests by the other members.

27

28

1 ***C. Present Posture of the Case***

2 The following is a description of the pre-petition litigation and the current status of the claims
3 related thereto:

4 **Beitler v. Bral, Case No. BS146302**

5 On or about December 5, 2013, Beitler commenced an action against the Debtor in the
6 Superior Court of California, County of Los Angeles for breach of contract, which was assigned
7 Case No. BS146302. The case was tried before Private Judge Hon. Carl J. West (ret.) on or about
8 June 16, 2016, and subsequently taken under submission. On or about October 11, 2016, Judge
9 West issued a Statement of Decision finding in favor of Beitler in all material respects.

10 On or about November 17, 2016, the Superior Court entered a Judgment on Statement of
11 Decision (the “Judgment on Decision”), which provides that Beitler shall have and recover against
12 the Debtor: (1) damages in the sum of \$591,826.61, plus accruing interest at the rate of \$92.64 per
13 day from and after June 15, 2016 through the date of entry of the Judgment; (2) Attorneys’ fees in
14 the sum of \$118,083.50; (3) Costs in the sum of \$2,387.37; (4) Fees paid to JAMS in the sum of
15 \$39,640.02; and (5) Transcript fees in the sum of \$1,672.61. In addition, the Judgment on Decision
16 would accrue post-judgment interest at the statutory rate.

17 On or about January 18, 2017, Beitler filed and served motions for charging orders, creating
18 liens against the Debtor’s membership interests in the Companies (defined herein as the “Charging
19 Liens”) with respect to the amounts owed pursuant to the Judgment on Decision. Because the
20 hearing on the motions was not heard as of the Petition Date, however, the Debtor asserted that the
21 Charging Liens were unperfected in the Case and subject to avoidance under applicable law. Beitler
22 disagreed with the Debtor’s contentions in this regard. On June 16, 2017, Beitler filed a proof of
23 claim (“Claim No. 13-1”), asserting a secured claim based on the amount due pursuant to the
24 Judgment on Decision, in the amount of \$788,798.91 as of the Petition Date, not including post-
25 judgment fees, costs and post-petition interest.

26 On May 9, 2017 (as thereafter amended on October 6, 2017), following the Debtor’s
27 demand to Beitler to remove the Charging Liens as they were avoidable (and Beitler’s
28 unwillingness to do so), the Debtor commenced the Beitler Avoidance Action (described below),

1 asserting that the Charging Liens against the Debtor's interests in the Companies related to the
2 Judgment on Decision were unperfected and should be avoided under, inter alia, 11 U.S.C. §§
3 544(a), 547 and 550, and on October 13, 2017, filed an objection to Claim No. 13-1 on these
4 grounds. [Docket No. 135]. As described in further detail below, over Beitler's objection, the
5 Court granted the Debtor's motion for summary judgment on the avoidability of the Charging
6 Liens under 11 U.S.C. § 544(a). The order granting the Debtor's motion for summary judgment
7 (defined herein as the "MSJ Order") resolved, in the Debtor's favor, the Debtor's claims under
8 section 544(a), and related relief under sections 502 and 550, but left open for future proceedings
9 the section 547 issues.

10 **Beitler v. Bral, Case No. BC532523**

11 On or about January 8, 2014, Beitler commenced an action against the Debtor in Los Angeles
12 Superior Court, commencing Case No. BC532523. The complaint alleges causes of action for: (1)
13 breach of written contract; (2) money had and received; (3) money lent; (4) unjust enrichment; (5)
14 an accounting; (6) breach of fiduciary duty; (7) breach of oral contract; (8) breach of implied
15 contract; (9) unjust enrichment contribution; (10) equitable indemnity; and (11) account stated. On
16 or about July 8, 2014, the Debtor filed his answer to the complaint.

17 On or about November 7, 2016, as a discovery sanction, the Superior Court entered an order
18 striking the Debtor's answer and entered a default judgment in favor of Beitler. The default
19 judgment provides damages in the sum of \$1,765,202, plus prejudgment interest in the amount of
20 \$749,429 and post-judgment interest at the statutory rate (the "Default Judgment"). On or about
21 January 5, 2017, the Debtor filed an appeal of the Default Judgment. The Debtor believes that the
22 striking of the answer and the entry of the Default Judgment, which was entered as a "terminating
23 sanction," was an abuse of discretion and will be overturned on appeal to allow the merits of the
24 dispute to be heard. Beitler disagrees with the Debtor's contentions in this regard. Relief from stay
25 has been granted to allow the Debtor's appeal of the Default Judgment to proceed, and the briefing
26 process is currently underway.

27 As with the Judgment on Decision discussed above, on or about January 18, 2017, Beitler
28 filed and served motions for charging orders, creating the Charging Liens against the Debtor's

1 membership interests in the Companies with respect to the amounts owed pursuant to the Default
2 Judgment. Because the hearing on the motions was not heard as of the Petition Date, however, the
3 Debtor asserted that the Charging Liens were unperfected in the Case and subject to avoidance under
4 applicable law. Beitler disagreed with the Debtor's contentions in this regard. On June 16, 2017,
5 Beitler filed a proof of claim ("Claim No. 10"), asserting a secured claim based on the Default
6 Judgment, in the amount of \$2,589,725.46 as of the Petition Date, not including post-judgment fees,
7 costs and post-petition interest.

8 On May 9, 2017 (as thereafter amended on October 6, 2017), following the Debtor's demand
9 to Beitler to remove the Charging Liens as they were avoidable (and Beitler's unwillingness to do
10 so), the Debtor commenced the Beitler Avoidance Action (described below), asserting that the
11 Charging Liens against the Debtor's interests in the Companies related to the Default Judgment
12 were unperfected and should be avoided under, inter alia, 11 U.S.C. §§ 544(a), 547 and 550.
13 Additionally, on October 13, 2017, the Debtor filed an objection to Claim No. 10, asserting that
14 Claim No. 10 is not supported by sufficient evidence (as it relies solely on the Default Judgment
15 and charging order motions), and that such claim does not take into account the Debtor's defenses
16 to the asserted liability, including with respect to the calculation of any such liability. [Docket No.
17 142].

18 As with the Judgment on Decision discussed above, the MSJ Order resolved, in the Debtor's favor,
19 the Debtor's claims under section 544(a), and related relief under sections 502 and 550, but left open
20 for future proceedings the section 547 issues.

21 **Beitler and Beitler & Assoc. v. Bral, Case No. BC543410**

22 On April 21, 2014, Beitler and BCRS commenced an action in Los Angeles Superior Court
23 against the Debtor, Venture RE Group, and BRA relating to the ownership and management of a
24 number of limited liability companies formed by the Debtor and Beitler, including the Companies
25 (the "Beitler/BCRS State Court Action"). The causes of action alleged in the Beitler/BCRS State
26 Court Action are: (1) breach of fiduciary duty; (2) accounting; (3) unjust enrichment; (4) intentional
27 misrepresentation; (5) negligent misrepresentation; (6) breach of oral contract; and (7) breach of
28

1 implied contract. Trial in this matter was scheduled for June 12, 2017, but was stayed by the
2 bankruptcy filing. The Beitler/BCRS State Court Action is still pending, but remains stayed.

3 On June 16, 2017, Beitler filed a proof of claim (“Claim No. 11”) and BCRS filed a
4 substantially similar proof of claim (“Claim No. 9”) asserting unsecured claims in undetermined
5 amounts based on the allegations set forth in the Beitler/BCRS State Court Action. On October 13,
6 2017, the Debtor filed objections to Claim Nos. 9 and 11 [Docket Nos. 151 (Claim No. 9) and 153
7 (Claim No. 10)], asserting, *inter alia*, that the claims are vague, ambiguous, contradictory and
8 unsupported by evidence, the claimants fail to establish standing, and the claims are barred by the
9 statute of limitations and the doctrine of laches. Moreover, even assuming the claims could be
10 considered notwithstanding these infirmities, the Debtor disputes the underlying allegations on the
11 merits. In addition, Beitler and BCRS filed adversary proceedings against the Debtor in which they
12 seek to hold the claims asserted by way of Claim Nos. 9 and 11 (as well as Claim No. 14 filed by
13 Beitler)² non-dischargeable (defined herein as Adversary 92 and Adversary 94). The Debtor has
14 filed a motion to dismiss Adversary 92 and Adversary 94 on the grounds that, among other things,
15 there is no underlying claim for the same reasons as set forth in the Debtor’s objection to Claim
16 Nos. 9, 11 and 14, and the actions otherwise fail to meet the standards for holding claims non-
17 dischargeable. Beitler and BCRS disagree with the Debtor’s contentions in this regard and believe
18 that Claim Nos. 9, 11 and 14 should stand in the amounts set forth therein and such claims should
19 be found to be non-dischargeable.

20 In addition, as discussed in detail below, such claims asserted by Beitler and BCRS are
21 subject to the Debtor’s Motion to Strike, pursuant to which the Debtor seeks the disallowance of

22

23 ² While not tied to litigation commenced pre-petition, on June 16, 2017, Beitler filed a proof of
24 claim (“Claim No. 14”) asserting an unsecured claim in an undetermined amount based on
25 allegations relating to the ownership and management of the Companies. Boyd filed a substantially
26 similar proof of claim (“Claim No. 16”) relative to her 5% interest in Westcliff. On October 13,
27 2017, the Debtor filed objections to Claim Nos. 14 and 16, asserting, *inter alia*, that the claims are
28 barred by the statute of limitations, the parole evidence rule and the doctrines of waiver and estoppel.
Moreover, even assuming the claims could be considered notwithstanding these infirmities, the
Debtor disputes the underlying allegations on the merits. [Docket Nos. 161 and 155]. As discussed
below, Claim Nos. 14 and 16 (as well as Claim Nos. 9 and 11) are subject to the Debtor’s Motion
to Strike. Beitler and Boyd dispute the Debtor’s contentions with respect to their claims and the
Motion to Strike.

1 certain claims asserted by Beitler, BCRS and Boyd (Claim Nos. 9, 11, 14 and 16) as the Debtor
2 believes that such claims are based on falsified evidence (in the form of an altered version of the
3 Westcliff Operating Agreement that is materially adverse to the Debtor and favorable to Beitler).
4 Beitler, BCRS and Boyd dispute the Debtor's contentions in connection with the Motion to Strike.

5 **Cannae Financial LLC v. Bral, et al., Case No. 30-2014-00733044**

6 Cannae Financial LLC ("Cannae"), an entity owned by Beitler, filed a complaint against the
7 Debtor on July 9, 2014, in Orange County Superior Court alleging breach of guaranty. Cannae
8 purchased a loan from Premier Business Bank that was provided to Ocean View Medical Investors,
9 LLC ("Ocean View") and guaranteed by the Debtor. Cannae sued the Debtor for breach of the
10 guaranty. Judgment after the granting of a motion for summary judgment was entered in favor of
11 Cannae in the amount of \$316,635.67 on July 16, 2015. An award of attorney's fees was
12 subsequently entered in the amount of \$19,252. The Debtor appealed the entered judgment (Case
13 No. GC53083) (the "Cannae Appeal"). The appeal was dismissed, but the dismissal was
14 subsequently vacated and the appeal proceeded until stayed by the bankruptcy filing. On June 5,
15 2017, the Debtor filed a motion for relief from the automatic stay to allow oral argument in the
16 Cannae Appeal to proceed (the "Cannae RFS Motion") [Docket No. 60]. The Cannae RFS Motion
17 was granted at the hearing held on June 14, 2017, and the order entered that same day [Docket No.
18 71].

19 On June 16, 2017, Cannae filed a proof of claim ("Claim No. 17-1") asserting that the
20 Cannae Secured Claim (in the amount of \$394,483.12 as of the Petition Date (not including post-
21 judgment fees, costs and post-petition interest)) was secured against the Debtor's interest in
22 Westcliff and his real property,³ but also including the Debtor's interest in Mission as security. On
23 October 13, 2017, the Debtor filed an objection to Claim No. 17-1 for the purpose of clarifying that
24 the Cannae Secured Claim is not secured by his interest in Mission. [Docket No. 137]. This issue

25
26 ³ Claim No. 17-1 states "TBD" as to the value of the property, and the amount that is secured versus
27 unsecured. However, based on the subsequent outcome in the Cannae Appeal sustaining the
28 findings of the trial court as to the judgment against the Debtor, the Debtor believes that, because
the Cannae Secured Claim is secured against his interest in Westcliff (and otherwise), that the
Cannae Secured Claim is a fully secured claim and is so treated under the Plan.

1 has been, or will be, resolved to clarify that Cannae has no lien on the Debtor's membership interests
2 in Mission in connection with the Cannae Secured Claim. The Debtor believes this issue should be
3 resolved consensually or, alternatively, will be resolved summarily by the Court.

4 Oral argument on the Cannae Appeal was held on June 20, 2017, and the appellate court
5 sustained the findings of the trial court as to the judgment against the Debtor based on the guaranty.

6 In connection with this suit by Cannae, Cannae had obtained a charging order against the
7 Debtor's interest in Westcliff on December 7, 2015, and judgment liens on the Debtor's real property
8 by recording abstracts of judgment in Orange, Los Angeles, and Kern counties in August 2015. The
9 judgment affirmed by way of the Cannae Appeal, therefore, is a secured claim against these assets
10 (in the asserted amount of approximately \$395,000 as of the Petition Date, not including post-
11 judgment fees, costs and post-petition interest).

12 **Cannae Financial LLC v. Bral, et al., Case No. 30-2015-00764942**

13 On January 7, 2015, Cannae filed an action against the Debtor for breach of guaranty in
14 Orange County Superior Court. Cannae requested the entry of default against the Debtor and a
15 default judgment in the amount of \$1,210,792.29 was entered on June 23, 2015 (the "Cannae Default
16 Judgment"). Cannae filed a motion for a charging order on September 16, 2015. The Debtor filed
17 a motion to set aside the judgment and Cannae Default Judgment on December 9, 2015. Ultimately,
18 the Court ruled that the judgment and Cannae Default Judgment should both be vacated and ruled
19 that the motion for charging order was moot.

20 The Debtor filed an answer to the complaint on May 6, 2016, as well as a cross-complaint
21 for contribution and declaratory relief for contribution. Cannae filed a demurrer to the cross-
22 complaint, which was granted by the superior court with 10 days leave to amend. The cross-
23 complaint was not amended. This action is still pending, but has been stayed by the bankruptcy
24 filing.

25 On June 16, 2017, Cannae filed a proof of claim ("Claim No. 18") asserting an unsecured
26 claim based on the Cannae Default Judgment in the amount of \$1,421,510.01 as of the Petition Date,
27 not including post-judgment fees, costs and post-petition interest (the "Cannae Unsecured Claim").
28 On October 13, 2017, the Debtor filed an objection to Claim No. 18, asserting that the Cannae

1 Unsecured Claim is not supported by sufficient evidence (as it relies solely on the Cannae Default
2 Judgment, which has been set aside), and that such claim is unliquidated and subject to
3 determination by way of the claims objection process, and must take into account the Debtor's
4 defenses to the asserted liability, including with respect to the calculation of any such liability.
5 [Docket No. 145]. Cannae disagrees with the Debtor's contentions in this regard and believes that
6 the Cannae Unsecured Claim should stand in the amount set forth in the Cannae Default Judgment.

7 **Steward Financial, LLC and AFG assignees of First Citizens Bank v. Beitler, et al., Case No.**

8 **BC525778**

9 On October 25, 2013, First-Citizens Bank & Trust Co. ("FCBT") filed a complaint against
10 Beitler, the Debtor, and others in the Los Angeles Superior Court for breach of guaranty related to
11 a loan to Ocean View that was secured by real property owned by Ocean View (the "Ocean View
12 Property"). On January 10, 2014, the Debtor filed his answer to the complaint. On March 19, 2014,
13 a writ of attachment securing \$5,355,059.42 was issued against the Debtor, the Sandpiper Property
14 and the Los Angeles Condominium (the "Writ of Attachment"). Steward Financial LLC
15 ("Steward"), an entity owned by Beitler, acquired FCBT's interest in this litigation and continued
16 the action against Ocean View and the Debtor. Steward contends that it acquired the Ocean View
17 Property, on or about March 20, 2015, for a \$4.1 million credit bid. On October 23, 2015, Steward
18 filed a motion for summary judgment against the Debtor on his personal guaranty. On December
19 31, 2015, the Debtor filed opposition to the motion for summary judgment. On January 15, 2016,
20 the Court entered its ruling denying the motion for summary judgment. On November 17, 2016,
21 the Debtor filed an application for an order setting aside the Writ of Attachment, which Steward
22 claimed was assigned to it by FCBT, including on the grounds that the Writ of Attachment was not
23 assignable to, or enforceable by, Steward. On March 7, 2017, the Court entered its minute order
24 stating that in light of the bankruptcy filing by the Debtor, the Debtor's application to set aside the
25 Writ of Attachment was off calendar. The action remains pending, but stayed as a result of the
26 bankruptcy filing. The Writ of Attachment has expired pursuant to applicable law.

27 On June 16, 2017, Steward filed a proof of claim ("Claim No. 20") asserting an unsecured
28 claim against the Debtor in the amount of at least \$2,593,638.81 as of the Petition Date, not including

1 fees and costs, or post-petition interest, reflecting the difference between Steward's \$4.1 million
2 credit bid and the total amount allegedly owed in connection with the Ocean View loan (the
3 "Steward Guaranty Unsecured Claim"). On October 13, 2017, the Debtor filed an objection to
4 Claim No. 20, asserting that the Steward Guaranty Unsecured Claim is not a valid claim because
5 the guaranty was secured by real property and was extinguished under California law by virtue of
6 Steward's foreclosure of the Ocean View Property. [Docket No. 159].

7 **Steward Financial, LLC v. Bral, et al., Case No. 30-2016-00834111**

8 On February 5, 2016, Steward filed a complaint against the Debtor, James Hornbuckle and
9 Cornerstone Law Corporation for: (1) abuse of process; (2) intentional interference with contract;
10 and (3) negligent interference with contract in Orange County Superior Court. In this action,
11 Steward contends that it acquired the Ocean View Property at a foreclosure sale held on November
12 21, 2014, for a \$3 million credit bid. This sale was rendered void as a result of bankruptcy filings
13 by Ocean View. Steward further contends that it acquired the Ocean View Property at a second
14 foreclosure sale held after the dismissal of the Ocean View bankruptcy cases, on or about March 20,
15 2015, for a \$4.1 million credit bid. Steward requested the entry of default against the Debtor and
16 his default was entered on May 20, 2016. On July 27, 2016, the Debtor filed a motion to set aside
17 the entry of default along with his answer to the complaint. The motion to set aside was granted by
18 minute order entered on November 1, 2016. This matter is pending, but stayed by the bankruptcy.

19 On June 16, 2017, Steward filed a proof of claim ("Claim No. 19") asserting an unsecured
20 claim against the Debtor in the amount of at least \$1.1 million, not including fees, costs or interest,
21 based on the differential between its first and second credit bids for the Ocean View Property (the
22 "Steward Foreclosure Differential Unsecured Claim"). On October 13, 2017, the Debtor filed an
23 objection to Claim No. 19, asserting that the Steward Foreclosure Differential Unsecured Claim is
24 barred by the economic loss doctrine, is not a valid claim because any damage claim by Steward
25 would be limited to the damage claim, if any, under the guaranty (which, as discussed above,
26 Steward asserts as a separate claim against the Debtor by way of Claim No. 20) and the loss
27 causation element fails. [Docket No. 157]. Steward also filed an adversary proceeding against the
28 Debtor in which it seeks to hold the Steward Foreclosure Differential Unsecured Claim non-

1 dischargeable (defined herein as Adversary 95). The Debtor has filed a motion to dismiss Adversary
2 95 on the grounds that, among other things, there is no underlying claim for the same reasons as set
3 forth in the Debtor's objection to Claim No. 19 and the action otherwise fails to meet the standards
4 for holding a claim non-dischargeable.

5 **Bral, et al. v. Beitler, et al., Case No. BC559311**

6 The Debtor and Ocean View filed a complaint against Beitler and Steward on April 15, 2014,
7 alleging breach of the operating agreement of Ocean View. A first amended complaint was filed to
8 which Beitler filed a demurrer. The demurrer was unopposed and on March 18, 2015, the Court
9 ordered the Debtor to file a second amended complaint within 10 days. No further amended
10 complaint was filed and on May 29, 2015, the Debtor filed a request for dismissal of the entire action
11 without prejudice. The case was dismissed the same day.

12 Beitler filed a motion for attorneys' fees in the amount of \$64,576. On January 25, 2016,
13 the Court ruled that Beitler was entitled to reasonable attorney's fees and on February 29, 2016,
14 determined that the amount requested by Beitler was reasonable and he was thus awarded \$64,576
15 in attorneys' fees against the Debtor. On June 16, 2017, Beitler filed a proof of claim ("Claim No.
16 12") asserting an unsecured attorneys' fee claim in the amount of \$71,705.68 as of the Petition Date,
17 not including interest. The Debtor has not objected to Claim No. 12.⁴

18 **Beitler v. Bral, et al., Case No. BC567567**

19 Beitler filed a complaint against the Debtor and Ocean View on September 3, 2014, in Los
20 Angeles Superior Court. The second amended complaint was filed on December 24, 2015, and
21 alleged causes of action for breach of contract and breach of fiduciary duty. On May 18, 2016, the
22 Debtor filed an answer to the second amended complaint. On September 1, 2016, a Request for
23

24 _____
25 ⁴ Beitler has also filed Claim No. 15 and Claim No. 21 in the Case, asserting unsecured claims in
26 the amounts of \$40,663.33 and \$198,065.35, respectively. The Debtor has filed objections to these
27 Claims. On May 24, 2018, Beitler filed a new claim, Claim No. 23, asserting claims in an
28 undetermined amount based on contribution and indemnification in connection with a cross-
complaint by Brothers, Inc. against the BCBS and the Debtor. The Debtor reserves all rights to
object to this Claim. Such Claims, to the extent Allowed, shall be treated as Class 12 Unsecured
Claims under the Plan.

1 Dismissal (of the entire action of all parties and all causes of action) was filed and the dismissal
2 entered as requested on September 1, 2016.

3 On November 1, 2016, the Debtor filed a motion for order awarding attorney's fees. On
4 February 2, 2017, an order granting the Debtor's motion for order awarding attorney's fees was
5 entered, awarding attorney's fees to the Debtor in the amount of \$30,000, subject to offset for sums
6 owing by the Debtor on judgments and orders in favor of Beitler. On February 28, 2017, Beitler
7 filed a notice of appeal relating to the February 2, 2017 award of attorney's fees to the Debtor. On
8 or about March 21, 2018, Beitler filed a request to have the appeal dismissed. As provided in the
9 superior court's order, the amount awarded to the Debtor will be utilized as an offset against amounts
10 owed to Beitler.

11 **Bral v. Westcliff Investors, LLC, Case No. BC553693**

12 On November 20, 2013, the Debtor filed a complaint against Westcliff, Beitler, and Boyd in
13 the Orange County Superior Court for: (1) involuntary dissolution of limited liability company; (2)
14 accounting; (3) breach of fiduciary duty; and (4) declaratory relief (the "Westcliff Litigation"). The
15 case was transferred to Los Angeles Superior Court on August 5, 2014, and was subsequently
16 ordered into arbitration (defined herein as the "Westcliff Arbitration"). In the Westcliff Litigation,
17 a status conference and OSC regarding dismissal pursuant to reservation to arbitration was
18 scheduled for June 26, 2018, a final status conference was scheduled for June 24, 2018 and trial was
19 scheduled for July 30, 2018. The Debtor anticipates that these matters will be vacated and the issues
20 resolved by way of the Westcliff Arbitration. The Arbitrations will determine the economic matters
21 related to the dissolution of the Companies under applicable California law.

22 **1. The Bar Date and Filed Proofs of Claim**

23 Pursuant to Court order, June 16, 2017 (the "Bar Date") was fixed as the last date to File
24 Proofs of Claim, except for governmental units. The Debtor served creditors and parties in interest
25 with the Bar Date Notice on April 21, 2017.⁵ Approximately twenty-three proofs of claim were
26

27 ⁵ On April 24, 2018, the Debtor served a supplemental notice of the bar date to the Companies'
28 secured lenders that were not provided notice of initial bar date, with respect to any contingent

1 filed in the Debtor's case, with a total of approximately \$11,231,514.58 asserted. The Debtor filed
2 objections to the following claims, which have been sustained by the Court:

3 Objection to Claim No. 22 of Samini Scheinberg, PC [Docket No. 131]. On February 12,
4 2018, this Court entered its order disallowing in its entirety Claim No. 22 [Docket No. 305].

5 Objection to Claim No. 2 of American Honda Finance Corporation [Docket No. 133]. On
6 December 21, 2017, this Court entered its order disallowing and expunging in its entirety Claim No.
7 2 [Docket No. 268].

8 Objection to Claim No. 3 of Nuray DePriest [Docket No. 164]. On December 18, 2017, this
9 Court entered its order disallowing and expunging in its entirety Claim No. 3 [Docket No. 264].

10 In addition, the Debtor has filed objections to the following claims of Beitler and his related
11 entities, as follows:

- 12 • Objection to Claim No. 13 of Beitler [Docket No. 135].
- 13 • Objection to Claim No. 17 of Cannae [Docket No. 137].
- 14 • Objection to Claim No. 21 of Beitler [Docket No. 139].
- 15 • Objection to Claim No. 10 of Beitler [Docket No. 142].
- 16 • Objection to Claim No. 18 of Cannae [Docket No. 145].
- 17 • Objection to Claim No. 14 of Beitler [Docket No. 147], as amended [Docket No.
18 161].
- 19 • Objection to Claim No. 15 of Beitler [Docket No. 149].
- 20 • Objection to Claim No. 9 of BCRS [Docket No. 151].
- 21 • Objection to Claim No. 11 of Beitler [Docket No. 153].
- 22 • Objection to Claim No. 16 of Boyd [Docket No. 155].
- 23 • Objection to Claim No. 19 of Steward [Docket No. 157].

24
25 guarantee claims the secured lenders might assert against the Debtor. No claims were filed by these
26 contingent claimants by the supplemental bar date. In any event, the Debtor reserves all rights to
27 object to or seek to estimate any such claims on any appropriate grounds, and reserves his rights of
28 contribution and otherwise against any co-guarantor, including Beitler or his related entities,
including any trust or entity in which Beitler holds an ownership interest, with respect to the payment
of any such claims.

- 1 • Objection to Claim No. 20 of Steward [Docket No. 159].

2 As a result of the Motion to Strike (discussed in Beitler and Beitler & Assoc. v. Bral, Case
3 No. BC543410 section of the Application), the hearings and any related deadlines with
4 respect to the Beitler, BCRS, Boyd, Cannae and Steward claims were vacated in order to allow
5 discovery to proceed.⁶

6 **2. The Schedules**

7 The Debtor filed its Schedules of Assets and Liabilities and Statement of Financial Affairs
8 (collectively, the “Schedules”) on March 10, 2017. Thereafter, the Debtor filed certain amendments
9 to the Schedules on May 2, 2018 and May 16, 2018.

10 **3. Status of a Plan of Reorganization, and Professional Fee Claims [LBR 2016-
11 1(a)(1)(A)(i)]**

12 The Debtor filed a fourth amended chapter 11 plan (the “Fourth Amended Plan”) on July 31,
13 2019 [docket no. 761], and on July 31, 2019, the Court entered its order confirming the Fourth
14 Amended Plan (the “Confirmation Order”) [docket no. 762]. The Confirmation Order became final
15 on August 14, 2019. Any capital terms not otherwise defined in this Application, shall have the
16 same meaning ascribed to them in the Fourth Amended Plan.

17 Pursuant to the Fourth Amended Plan, the Professionals in the Debtor’s Case will be paid,
18 pari passu among the Professionals from the Distribution Fund as such funds become available to
19 the Debtor to pay Professional Fee Claims. In consideration for their agreement not to require
20 payment in full on account of their Professional Fee Claims on the Effective Date, in addition to
21 Administrative Claim status, the holders of the Professional Fee Claims will be granted, pari passu,
22 a super-priority claim and security interest (junior only to the liens of the holders of Allowed
23 Secured Claims in existence as of such time) in the Debtor’s Assets (including, without limitation,
24 the Companies) (the “Professional Fee Claim Lien”). The Professional Fee Claim Lien shall secure
25 any and all fees and expenses incurred on behalf of the Debtor and Reorganized Debtor prior to and
26

27 ⁶ The Court continues to hold in abeyance all objections to claims of the Beitler Parties (including
28 those that are not specifically related to the Motion to Strike) pending a determination on the Motion
to Strike.

1 following the Effective Date of the Plan in connection with the Case, the Plan, its implementation,
2 pursuing and/or defending Causes of Action (including, without limitation, Adversaries 92, 94 and
3 95), Objections to Claims, in connection with the Arbitrations or otherwise incurred in the
4 representation of the Debtor, the Estate, or the Reorganized Debtor.

5 **4. Estimated Accrued Administrative Expenses [LBR 2016-1(a)(1)(A)(iv)]**

6 The Debtor's reorganization counsel Shulman Hodges & Bastian LLP ("SHB"), former
7 reorganization counsel Lobel Weiland Golden Friedman LLP ("LWGF"), accountant Hahn Fife &
8 Company LLP ("Hahn"), special counsel Sall Spencer Callas & Krueger ("Sall Spencer") and
9 financial advisor/expert witness Force 10 Partners ("Force 10") will be seeking final fees and
10 reimbursement of expenses in this case as will be set forth in their respective Applications to be
11 filed and heard concurrent with the Firm's Fee Application and each are incorporated herein by
12 this reference pursuant Local Bankruptcy Rule 2016-1(a)(1)(A)(iv).

13 As to creditors holding other administrative claims in this case (claims other than those of
14 professionals employed in the case), as stated in the Fourth Amended Plan, no other
15 administrative expenses were estimated to be owed, not including, any potential administrative tax
16 claims that would be owed in connection with the disposition of the Debtor's assets. The Debtor's
17 tax professionals, however, do not believe that there will be any tax liability resulting from the
18 disposition of assets.

19 **5. Estimated Accrued Administrative Expenses [LBR 2016-1(a)(1)(A)(iv)]**

20 The Fourth Amended Plan is a liquidating plan. Allowed Claims will be paid, in
21 accordance with their respective priorities, from a Distribution Fund consisting of monies derived
22 from the following:

23 a. The monetization of the Debtor's ownership interests in two limited liability
24 companies, Mission Medical Investors, LLC ("Mission") and Westcliff Investors, LLC
25 ("Westcliff" and, together with Mission, the "Companies"). Funds will be generated by
26 the purchase of the Debtor's membership interests in the Companies by Beitler;

27 b. To the extent that the funds from the monetization of the Companies are
28 insufficient to pay Allowed Claims in full, the Debtor will liquidate certain of his other

1 personal property, to the extent equity exists and the assets are not exempt. The Debtor
2 will retain his interest in the Sandpiper Property;

3 c. Potential recovery from a malpractice claim the Debtor holds against state
4 court counsel;

5 d. Proceeds from the Debtor's contribution claims against co-guarantors; and

6 e. Distributions from the Companies on account of the Debtor's ownership
7 interests therein.

8 As of September 11, 2019, the Debtor had funds on hand in the amount of \$328,486.00
9 (\$10,447 in the Debtor's bank account and \$318,039 in funds held in trust by SHB).

10
11 **IV. NARRATIVE STATEMENT OF SERVICES RENDERED AND TIME EXPENDED**

12
13 **A. Services Performed and Time Expended During the Application Period
Covered by This Application**

14 Pursuant to the Compensation Guidelines and Local Bankruptcy Rule 2016-1(a)(1)(D), the
15 Applicant has classified all services performed for which compensation is sought for the
16 Application Period into one of several major categories. The Applicant attempted to place the
17 services performed in the category that best relates to the service provided. However, because
18 certain services may relate to more than one category, services pertaining to one category may in
19 fact be included in another category.

20
21 **1. Asset Analysis and Recovery**

22 Time billed to this category relates to asset analysis and recovery issues. During the
23 Application Period, the Firm, among other things: (1) reviewed and analyzed charging lien issues;
24 (2) performed work regarding a motion for summary judgment avoiding charging lien; (3)
25 reviewed and analyzed issues regarding perfection of charging order; (4) attended to issues
26 regarding a reply to motion for summary judgment relating to avoidance of liens; (5) reviewed and
27 analyzed notice of sale issues; (6) reviewed and analyzed issues regarding the value of Mission
28 property; (7) reviewed and analyzed issues regarding the engagement of an appraiser for the

1 Sandpiper property; (8) reviewed and analyzed issues regarding the valuation of partnership
2 interests owned by John Bral; (9) reviewed and analyzed an appraisal of the Sandpiper property;
3 (10) reviewed and analyzed issues regarding calculation of the payment amount if a dissolution
4 suit is brought; (11) reviewed and analyzed the right to sell the Debtor's interest in LLC; (12)
5 reviewed and analyzed an appraisal of Westcliff property; (13) reviewed and analyzed the Mission
6 Operating Agreement; (14) reviewed and analyzed issues regarding the sale of Mission property
7 without a dissolution action; (15) reviewed and analyzed the appraisal of the Coffee Road Plaza
8 project; (16) performed work regarding appraisal declarations; (17) reviewed and analyzed issues
9 regarding malpractice claims against former counsel; (18) reviewed and analyzed issues regarding
10 capital accounts; (19) reviewed and analyzed sections 544 and 547 issues and appeal of default
11 judgment; (20) performed work regarding a status report for the Bral versus Beitler adversary; (21)
12 attended to issues regarding payment of appraisal fee for the Sandpiper property; (22) performed
13 work regarding an amended section 544 order; (23) reviewed and analyzed lien avoidance issues;
14 (24) reviewed and analyzed issues regarding litigation against Bobby Samini; and (25)
15 corresponded and conferred regarding asset analysis and recovery issues.

16 During the Application Period, the Applicant expended 28.10 hours on this category. The
17 amount of fees attributable to this matter is \$23,571.00.

18 **2. Asset Disposition**

19 Time billed to this category relates to asset disposition issues. During the Application
20 Period, the Firm, among other things: (1) reviewed and analyzed an offer to purchase Westcliff,
21 and performed work regarding a response; (2) reviewed and analyzed the Operating Agreement of
22 Mission regarding the right to sell property; (3) reviewed and analyzed legal and factual issues
23 regarding sales of various properties; and (4) corresponded regarding asset disposition issues.

24 During the Application Period, the Applicant expended 4.90 hours on this category. The
25 amount of fees attributable to this matter is \$4,165.00.

26
27
28

1 **3. Bankruptcy Litigation (combined with Adversary Actions, Avoidance Actions
2 and Venue)**

3 Time billed to this category relates to work regarding motions or adversary proceedings in
4 the Bankruptcy Court. During the Application Period, the Firm, among other things: (1) reviewed
5 and analyzed issues regarding scope of discovery involved in pending arbitrations; (2) reviewed
6 and analyzed potential discovery to be propounded on Beitler parties; (3) reviewed and analyzed
7 alternative courses of action regarding a motion to strike evidence; (4) considered bases for
8 objecting to discovery requests; (5) reviewed and analyzed issues regarding equity contributions of
9 John Bral; (6) reviewed and analyzed documents to be produced to Beitler parties; (7) performed
10 work regarding responses to requests for discovery; (8) performed work regarding joint status
11 reports for three Beitler adversary complaints; (9) performed work regarding a reply to Beitler's
12 opposition to motion for summary judgment regarding first amended complaint; (10) reviewed
13 and analyzed notices of continued status conferences in Beitler adversary matters; (11) reviewed
14 and analyzed joint status reports prepared by Beitler; (12) attended to issues regarding Beitler's
15 failure to produce documents in response to discovery demands; (13) prepared for and attended an
16 Omnibus hearing on February 27, 2019; (14) performed work regarding a joint discovery
17 stipulation; (15) performed work regarding a potential global settlement; (16) reviewed and
18 analyzed settlement issues and strategy; (17) reviewed and analyzed an order granting motions for
19 summary judgment avoiding lien based on section 544; (18) reviewed and analyzed possible
20 settlement scenarios and timing issues; (19) reviewed and analyzed tax issues related to settlement
21 negotiations; (20) performed work regarding a motion to dismiss Steward nondischargeability
22 complaint; (21) reviewed and analyzed the BCBS and Beitler responses to requests for production
23 of documents; (22) reviewed and analyzed issues regarding the ADA lawsuit; (23) performed
24 work regarding status reports in the Beitler & Associates, Beitler, and Steward Financial matters;
25 (24) reviewed and analyzed the first amended complaint in the Steward Financial non-
26 dischargeability matter; (25) performed work regarding an order lifting the automatic stay
27 concerning Beitler parties adversary matters; (26) performed work regarding exhibits and
28 declaration in support of motion to dismiss first amended complaint in the Steward matter; (27)

1 reviewed and analyzed protective order issues; (28) performed work regarding a motion for
2 protective order; (29) attended to emergency motion issues; (30) drafted an objection to
3 production of documents; (31) prepared for and attended a telephonic hearing on August 24, 2019
4 regarding emergency motion; (32) drafted an order on emergency motion; (33) reviewed and
5 analyzed the estoppel effect of not seeking fees in dismissal of Ocean View Bankruptcy related to
6 objection to Steward proof of claim; and (34) corresponded and conferred regarding bankruptcy
7 litigation issues.

8 During the Application Period, the Applicant expended 77.90 hours on this category. The
9 amount of fees attributable to this matter is \$58,147.50.

10 **4. Business Operations**

11 Time billed to this category relates to business operations issues. During the Application
12 Period, the Firm, among other things: (1) reviewed and analyzed issues regarding lack of
13 distributions from Mission and Westcliff; (2) reviewed and analyzed documents regarding
14 investment and distribution issues; (3) reviewed and analyzed issues regarding payment of
15 expenses by Bral Realty; (4) performed work regarding a stipulation with Cannae Financial and a
16 motion to approve stipulation regarding distributions from Westcliff; (5) reviewed and analyzed
17 issues regarding delinquent mortgage payments; (6) reviewed and analyzed financial issues; (7)
18 performed work regarding monthly operating reports; (8) performed work regarding a motion to
19 use Mission funds to pay living expenses; (9) reviewed and analyzed Beitler opposition to motion
20 to use funds to pay living expenses, and performed work regarding a reply; and (10) corresponded
21 and conferred regarding business operations issues.

22 During the Application Period, the Applicant expended 36.40 hours on this category. The
23 amount of fees attributable to this matter is \$26,689.00.

24 **5. Case Administration (combined with General Case Administration)**

25 Time billed to this category relates to miscellaneous case matters that are not easily
26 classified within any other specific categories, including such items as reviewing operating reports
27 and performing other administrative functions; analyzing case documents and correspondence;
28 communications with the Office of the United States Trustee (the “oust”); addressing general

1 creditor inquiries, and updating service lists. During the Application Period, the Firm, among
2 other things: (1) reviewed and analyzed critical date issues and maintained a critical date and
3 deadline memorandum; (2) reviewed and analyzed charging lien issues; (3) attended to arbitration
4 issues; (4) performed work regarding Monthly Operating Reports; (5) performed work regarding a
5 notice of change of firm for main case and four adversary proceedings; (6) performed work
6 regarding status report issues; (7) reviewed and analyzed, and conferred, regarding case strategy
7 issues; (8) reviewed and analyzed billing issues; (9) performed work regarding Schedule
8 amendments; (10) reviewed and analyzed a motion to convert; (11) performed research regarding
9 the motion to convert; (12) performed work regarding an opposition to motion to convert; (13)
10 performed work regarding a request for judicial notice in support of opposition to motion to
11 convert; (14) performed work regarding evidentiary objections relating to motion to convert; (15)
12 performed work regarding orders; (16) reviewed and analyzed scheduling issues; and (17)
13 corresponded and conferred regarding case administration issues.

14 During the Application Period, the Applicant expended 155.30 hours on this category.
15 The amount of fees attributable to this matter is \$102,028.50.

16 **6. Claims Administration and Objections**

17 Time billed to this category relates to work regarding claims administration and claims
18 objection issues. During the Application Period, the Firm, among other things: (1) performed
19 work regarding subpoenas to Beitler & Co., T. Lallas, and G. Klausner related to objections to
20 claim numbers 14 and 16; (2) performed work regarding objections to claim numbers 14 and 16;
21 (3) performed work regarding a continuance of hearing on objection to Samini claim; (4)
22 performed work regarding requests for production of documents in support of objections to
23 claims; (5) reviewed and analyzed discovery dispute issues relating to claim numbers 14 and 16;
24 (6) reviewed and analyzed issues regarding discovery and strategy regarding fraud allegations; (7)
25 reviewed and analyzed the Levene Neale objection to subpoena; (8) reviewed and analyzed the
26 Boyd response to motion to strike claim; (9) performed work regarding production of documents
27 to Beitler; (10) performed work regarding declarations in support of objections to claims; (11)
28 reviewed and analyzed the order sustaining objection to claim of Bobby Samini; (12) reviewed

1 and analyzed strategy regarding timing issues relating to claim objections and pending
2 arbitrations; (13) reviewed and analyzed pleadings relating to AFG and Beitler actions; (14)
3 reviewed and analyzed Halvorson decision in regard to claims objections; (15) reviewed and
4 analyzed transcripts; (16) performed work regarding a scheduling order relating to the motion to
5 disallow Claims 14 and 16; (17) performed work regarding a discovery stipulation relating to
6 motion to disallow claims; (18) reviewed and analyzed potential defenses to claims objections;
7 (19) reviewed and analyzed issues regarding a motion to strike proofs of claim and related non-
8 dischargeability actions; (20) performed work regarding a supplemental briefing in connection
9 with motion to strike proofs of claim and related non-dischargeability actions; (21) performed
10 work regarding amended motions to strike proofs of claims; (22) reviewed and analyzed issues
11 regarding strategy in dealing with non-responses to discovery; (23) reviewed and analyzed issues
12 regarding bank resolutions; (24) performed work regarding a special brief on crime fraud
13 exception as applied to motion to strike claims; (25) performed work regarding evidentiary
14 objections related to motion to strike claims; (26) reviewed and analyzed issues regarding
15 signatures on bank forms; (27) reviewed and analyzed the Beitler opposition to motion to strike
16 Lallas declaration; (28) reviewed and analyzed forgery issues; (29) reviewed and analyzed issues
17 regarding Pacific Western documents; (30) reviewed and analyzed issues regarding crime fraud
18 exception to attorney client privilege; (31) reviewed and analyzed issues regarding the doctrine of
19 unclean hands; (32) performed work regarding a supplement to motion to strike claims; (33)
20 attended to issues regarding transcript for hearing on motion to strike fraudulent claims; (34)
21 reviewed and analyzed documents produced by Levy, Small, Lallas, and Boyd; (35) performed
22 work regarding the engagement of a handwriting expert; (36) reviewed and analyzed documents
23 produced by Barry Beitler; (37) reviewed and analyzed correspondence from the Court regarding
24 relief from stay motions; (38) reviewed and analyzed issues regarding altered operating
25 agreements; (39) reviewed and analyzed a transcript regarding defensive arguments made by
26 Beitler relating to motion to strike claims; (40) reviewed and analyzed privilege issues regarding
27 document production; (41) reviewed and analyzed strategic issues concerning fraud committed by
28 Beitler parties; (42) performed work regarding the declaration of Gauthier and evidence in support

1 of motion to strike claim; (43) performed work regarding a special fraud brief relating to Claims 9,
2 11, 14, and 16; (44) performed work regarding an appendix of unpublished cases; (45) reviewed
3 and analyzed issues regarding lack of good faith responses to electronic discovery requests; (46)
4 reviewed and analyzed issues regarding guarantee claims concerning Mission and Westcliff
5 property loans; (47) performed work regarding subpoenas to Beitler, Rezak, and Boyd; (48)
6 reviewed and analyzed issues regarding use of handwriting expert testimony; (49) reviewed and
7 analyzed evidence relevant to alleged forgery of initials; (50) reviewed and analyzed case strategy
8 issues relating to two pending arbitrations; (51) performed work regarding preparation of cross
9 examination script for Betsy Boyd relating to hearing on motion to strike claims; (52) performed
10 work regarding subpoenas for Lallas, Beitler, Boyd, Klausner, Hurwitz and Rezak for claim
11 objections trial; (53) reviewed and analyzed the response to crime-fraud brief regarding attorney-
12 client privilege dispute relating to motion to strike claims; (54) prepared a reply to opposition to
13 crime brief filed by Beitler parties; (55) reviewed and analyzed cases cited, and pleadings and
14 arguments, regarding crime and fraud exception; (56) reviewed and analyzed valuation issues;
15 (57) reviewed and analyzed issues concerning striking of claims based on fraudulent documents;
16 (58) performed work regarding a request for judicial notice relating to reply to statement of Beitler
17 creditors regarding disallowance of Claims 14 and 16; (59) performed work regarding a notice of
18 intent to call witnesses for oral testimony; (60) reviewed and analyzed cross examination issues
19 for April 18, 2018 hearing; (61) performed work regarding preparation of visual exhibits for use in
20 cross examination of Beitler and Boyd at April 18, 2018 hearing; (62) reviewed and analyzed
21 issues regarding exclusion of witnesses at trial; (63) prepared for and attended a hearing on April
22 18, 2018 on issues relating to application of crime-fraud exception to attorney client privilege
23 within context of motion to strike proofs of Claims 14 and 16; (64) reviewed and analyzed issues
24 regarding reservation of rights against third parties; (65) prepared closing statement regarding
25 application of crime-fraud exception to discovery produced by Beitler parties relating to motion to
26 strike claims; (66) prepared for and attended closing arguments on May 3, 2018 regarding crime
27 and fraud issues; (67) reviewed and analyzed handwriting analysis of forged initials; (68)
28 performed work regarding an order on crime fraud exception; (69) performed work regarding

1 possible settlement of issues relating to crime fraud exception; (70) reviewed and analyzed factual
2 and evidentiary objections to claims objections; (71) performed work regarding requests for
3 electronically stored information from Barry Beitler and Beitler Commercial Real Estate Services;
4 (72) reviewed and analyzed the transcript of the hearing on motion to disallow claims; (73)
5 reviewed and analyzed potential settlement structures and amounts; (74) performed work
6 regarding an order relating to in camera review of privileged documents; (75) prepared an exhibit,
7 and reviewed and analyzed issues, regarding professional fees relating to motion to strike Beitler
8 parties claims; (76) reviewed and analyzed documents and transcripts regarding crime, fraud and
9 perjury issues; (77) performed work regarding supplemental evidence relating to perjury; (78)
10 reviewed and analyzed issues regarding claims based upon Mineral King property; (79) reviewed
11 and analyzed report of handwriting expert; (80) performed work relating to a supplemental brief
12 regarding further evidence in support of motion to strike claims; (81) performed work regarding an
13 analysis of professionals fees related to motion to strike claims; (82) attended to strategy relating
14 to forgery and discovery issues; (83) reviewed and analyzed a motion to compel supplemental
15 responses to discovery; (84) reviewed and analyzed perjury issues; (85) attended to issues
16 regarding evidence of Beitler's forging of initials on altered OPA; (86) performed work regarding
17 a stipulation to continue hearing and response date relating to motion to compel responses to
18 discovery; (87) reviewed and analyzed responses to requests for admission; (88) reviewed and
19 analyzed updated privilege logs; (89) reviewed and analyzed additional filed claims; (90) reviewed
20 and analyzed issues regarding a supplemental bar date and new claims; (91) reviewed and
21 analyzed amended claims filed by the Beitler parties; (92) reviewed and analyzed an order on the
22 motion to compel supplemental responses to discovery; (93) reviewed and analyzed the Beitler
23 reply to brief regarding further evidence in support of motion to disallow claims; (94) reviewed
24 and analyzed subordination of claims issues; (95) reviewed and analyzed Beitler opposition to
25 motion to compel responses to discovery; (96) performed work regarding an opposition to motion
26 to convert case to Chapter 7; (97) performed work regarding a scheduling order relating to motion
27 to strike claims; (98) reviewed and analyzed defects in defenses raised by Beitler parties relating
28 to motion to strike claims; (99) performed work regarding a final brief relating to motion to strike

1 claims; (100) performed work regarding the Debtor's reply brief relating to motion to compel
2 responses to requests for admission; (101) reviewed and analyzed evidentiary objections,
3 including objections to declaration of Hurwitz; (102) reviewed and analyzed documents, and
4 arguments made and potential arguments to be made by the Beitler parties, in preparation of final
5 brief regarding motion to strike; (103) performed work regarding the withdrawal of portions of
6 reply brief in support of motion compelling supplemental responses; (104) reviewed and analyzed
7 appellate issues concerning sections 544 and 547 attacks on Beitler's secured claim; (105)
8 performed work regarding proposed findings of fact and conclusions of law in support of final
9 brief relating to motion to strike claims; (106) reviewed and analyzed issues regarding section
10 1112(b); (107) reviewed and analyzed Beitler's responses to document requests; (108) reviewed
11 and analyzed issues regarding inconsistencies in testimony of Beitler; (109) reviewed and
12 analyzed supplemental opposition to motion to strike claims; (110) reviewed and analyzed
13 declarations filed by Beitler parties in support of supplemental brief in opposition to motion to
14 strike claims; (111) performed work regarding a response to Beitler's last supplemental brief
15 relating to motion to strike; (112) performed work regarding a proposed statement of undisputed
16 facts; (113) performed work regarding a motion to strike declarations of Lallas and Hurwitz; (114)
17 performed work regarding a request for judicial notice in support of motion to strike declarations;
18 (115) performed work regarding evidentiary objections to Hamilton declaration regarding motion
19 to strike; (116) performed work regarding an application for an order shortening time relating to
20 motion to strike; (117) performed work regarding an appendix of unpublished cases; (118)
21 performed work regarding a notice of hearing on shortened notice regarding motion to strike
22 declarations; (119) reviewed and analyzed arguments in reply to motion to strike declarations;
23 (120) reviewed and analyzed pleadings of record in preparation of closing argument on motion to
24 strike claims; (121) reviewed and analyzed an order denying motion to strike declarations; (122)
25 reviewed and analyzed mediation issues; (123) reviewed and analyzed Javaher Operating
26 Agreement; (124) reviewed and analyzed an order requiring mediation; (125) attended to issues
27 regarding a motion to dismiss non-dischargeability action in the Steward matter; (126) reviewed
28 and analyzed claims estimation issues; (127) reviewed and analyzed issues regarding mediation of

1 motion for disallowance of claims; (128) reviewed and analyzed BCRS claim number 23; (129)
2 reviewed and analyzed issues regarding estimation of claims for voting purposes; (130) reviewed
3 and analyzed issues concerning claims issues and treatment in Plan; (131) reviewed and analyzed
4 the Orange County Tax Collector claim; (132) reviewed and analyzed issues regarding the
5 Halvorson appeal; (133) reviewed and analyzed issues regarding motion to quash; (134) reviewed
6 and analyzed deposition subpoena of William Lobel; (135) performed work regarding a motion for
7 protective order; (136) prepared for and participated in a telephonic hearing on August 24, 2018
8 regarding ex parte motion for protective order; (137) performed work regarding stipulations
9 relating to temporary allowance of claims; (138) reviewed and analyzed production request to
10 William Lobel relating to subpoena; (139) performed work regarding stipulations relating to
11 claims 13 and 17; (140) attended to issues regarding withdrawal of claim 23; (141) performed
12 work regarding a stipulation relating to scheduling final arguments on motion to strike; (142)
13 reviewed and analyzed issues regarding claims treatment and Plan confirmation issues; (143)
14 reviewed and analyzed issues regarding alleged delinquency in payments to mortgage holder on
15 Sandpiper property; (144) reviewed and analyzed documents and correspondence in preparation
16 for closing argument relating to motion to strike record; (145) prepared for and attended hearing
17 on March 19, 2019 on closing argument relating to motion to strike proofs of claims; (146)
18 reviewed and analyzed petition for rehearing filed by Beitler; (147) reviewed and analyzed
19 transcript of hearing on motion to strike claims; (148) reviewed and analyzed issues regarding
20 treatment of Citi Bank claim; (149) performed work regarding a stipulation with CitiMortgage
21 relating to modification of mortgage and loan; (150) performed work regarding an insert to
22 objection to Steward proof of claim relating to preclusive effect of dismissal order; (151)
23 performed work regarding a motion to use funds to pay living expenses; (152) performed work
24 regarding an amended objection to Steward claim; (153) reviewed and analyzed a request for
25 continuance of hearing on claims objections and an order approving continuance; and (154)
26 corresponded and conferred regarding claim issues.

27 During the Application Period, the Applicant expended 618.30 hours on this category.
28 The amount of fees attributable to this matter is \$440,278.00.

1 **7. Fee/Employment Application, Employment of Professionals, and Fees of**
2 **Professionals**

3 Time billed to this category relates to the preparation of the instant Application, the
4 application to employ the Firm as special reorganization counsel to the Debtor, and issues
5 regarding the employment of other professionals. During the Application Period, the Firm, among
6 other things: (1) performed work regarding the Firm's employment application and employment
7 order; (2) attended to billing issues; (3) performed work regarding the employment of BBG as
8 appraiser; (4) performed work regarding the employment of Shulman Hodges & Bastian; (5)
9 performed work regarding the employment of Force 10 Partners as financial advisor and expert
10 witness for the Debtor; (6) reviewed and analyzed issues regarding professional fees; (7) reviewed
11 and analyzed issues regarding the retention application of Glass Ratner; (8) reviewed and analyzed
12 issues regarding the validity of a post confirmation lien for attorney's fees; (9) performed work
13 regarding the Firm's final fee application; and (10) corresponded regarding fee issues.

14 During the Application Period, the Applicant expended 41.90 hours on this category. The
15 amount of fees attributable to this matter is \$11,413.50.

16 **8. Non Bankruptcy Litigation (combined with Litigation)**

17 Time billed to this category relates to non-Bankruptcy Court litigation, including the
18 Beitler and Bral state court actions. During the Application Period, the Applicant, among other
19 things: (1) performed work regarding subpoenas; (2) reviewed and analyzed issues regarding the
20 Westcliff arbitration; (3) reviewed and analyzed proposed discovery to be propounded on Beitler
21 parties; (4) reviewed and analyzed issues regarding violation of the automatic stay; (5) reviewed
22 and analyzed appellate issues; (6) performed work regarding subpoenas for bank records; (7)
23 attended to deadline issues in the Westcliff arbitration; (8) reviewed and analyzed discovery
24 propounded by Beitler in the Westcliff arbitration; (9) reviewed and analyzed an answering
25 statement in the Mission arbitration; (10) reviewed and analyzed issues and potential discovery
26 regarding fraud claim; (11) reviewed and analyzed issues raised by a proposed stipulation
27 regarding scope of arbitration; (12) performed work regarding a motion for summary judgment on
28 section 544 issues; (13) reviewed and analyzed documents to be produced to Beitler; (14)

1 reviewed and analyzed scope of representation and scope of issues in arbitration; (15) reviewed
2 and analyzed Beitler objections to request for production; (16) reviewed and analyzed a motion to
3 strike Beitler discovery; (17) reviewed and analyzed strategy concerning discovery and arbitration;
4 (18) reviewed and analyzed global issues regarding resolution of Beitler litigation; (19) reviewed
5 and analyzed Westcliff and Mission equity accounts; (20) reviewed and analyzed objections to
6 discovery propounded on Levy Small, Lallas and Beitler; (21) attended to discovery response
7 timing issues; (22) reviewed and analyzed a joint statement regarding Beitler motion to strike
8 discovery; (23) reviewed and analyzed additional documents to be produced; (24) performed work
9 regarding correspondence to the Court concerning document production issues; (25) reviewed and
10 analyzed documents regarding motion of Bobby Samini to withdraw as counsel in State Court
11 litigation; (26) reviewed and analyzed documents produced relating to capital contributions; (27)
12 reviewed and analyzed status reports in various litigation matters; (28) reviewed and analyzed
13 discovery issues and developed strategy relating to non-bankruptcy litigation; (29) reviewed and
14 analyzed issues regarding continuance of appeal as violation of automatic stay; (30) reviewed and
15 analyzed issues concerning motion to avoid charging lien; (31) reviewed and analyzed issues
16 regarding responses to requests for admission and special interrogatories; (32) reviewed and
17 analyzed Barry Beitler and Betsy Boyd's responses to requests for production; (33) reviewed and
18 analyzed a privilege log in Westcliff arbitration; (34) reviewed and analyzed res judicata issues;
19 (35) reviewed and analyzed Robert Sargent's objections to request for document production
20 relating to deposition; (36) reviewed and analyzed a summary of documents produced by Robert
21 Sargent; (37) reviewed and analyzed issues regarding waiver of arbitration rights arguments; (38)
22 reviewed and analyzed an answer and cross complaint filed by Beitler in the Mission litigation;
23 (39) reviewed and analyzed lien issues; (40) performed work regarding scheduling issues; (41)
24 performed work regarding a joint statement relating to discovery dispute in the Westcliff
25 arbitration; (42) reviewed and analyzed co-managerial issues relating to Westcliff; (43) reviewed
26 and analyzed an arbitrator's order relating to joint discovery stipulation; (44) performed work
27 regarding motion to strike declaration of Tom Lallas and evidentiary objections; (45) drafted the
28 Debtor's portion of joint stipulation relating to Beitler's refusal to produce documents and evasive

1 discovery responses; (46) reviewed and analyzed issues regarding Sergent supplemental
2 production of documents; (47) reviewed and analyzed issues regarding documents produced by
3 Levy, Small and Lallas; (48) reviewed and analyzed issues regarding Levene Neale and BCRS
4 document production; (49) reviewed and analyzed indexes of documents produced by Betsy Boyd
5 and Sergent; (50) performed work regarding a joint discovery dispute stipulation regarding
6 BCRS's failure to produce any documents relating to motion to strike subpoena; (51) performed
7 work regarding scheduling orders; (52) performed work regarding an arbitration status report for
8 the Los Angeles Superior Court; (53) performed work regarding a joint statement relating to
9 discovery dispute arising from Beitler & Associates failure to produce documents in response to
10 subpoena; (54) performed work regarding potential settlement issues; (55) performed work
11 regarding exhibits to proposed joint discovery stipulation; (56) attended to issues regarding
12 inadvertently produced privileged documents; (57) reviewed and analyzed arguments to be made
13 regarding altered Operating Agreements; (58) prepared for and appeared at a status conference on
14 March 29, 2018 in the Los Angeles Superior Court relating to Westcliff; (59) reviewed and
15 analyzed guarantee claims against Bral in Mission and Westcliff; (60) reviewed and analyzed
16 issues regarding the deposition and testimony of Robert Sargent; (61) reviewed and analyzed
17 issues relating to Beitler perspective on pending issues and potential settlement proposals; (62)
18 reviewed and analyzed leases for Bakersfield and Westcliff properties; (63) reviewed and analyzed
19 an appraisal of the Westcliff property; (64) reviewed and analyzed issues regarding a writ of
20 attachment related to the Sandpiper property; (65) performed work regarding a settlement letter;
21 (66) reviewed and analyzed a complaint filed by Cannae in connection with Mineral King
22 property; (67) reviewed and analyzed spreadsheet and documentary evidence related to capital
23 account claims concerning Westcliff and Mission LLCs; (68) reviewed and analyzed an order
24 regarding withdrawal of Bobby Samini as counsel; (69) formulated strategy relating to arbitration
25 and timing issues; (70) reviewed and analyzed status of Gross matter; (71) reviewed and analyzed
26 the Tom Lallas response regarding stay of arbitration; (72) reviewed and analyzed a notice of case
27 management conference in the Westcliff matter; (73) performed work regarding a status report in
28 the Westcliff matter; (74) reviewed and analyzed issues regarding notice of withdrawal of portions

1 of reply brief; (75) reviewed and analyzed a motion to strike declaration of Alan Friedman and
2 evidentiary objections; (76) reviewed and analyzed responses to interrogatories in the Mission
3 litigation; (77) reviewed and analyzed issues regarding sanctions related to non-dischargeability
4 complaint; (78) analyzed alternatives available relevant to state court litigation and arbitration;
5 (79) prepared for and attended a status conference on October 10, 2018 in the Westcliff matter;
6 (80) performed work regarding a notice of continued status conference; (81) performed work
7 regarding a contempt motion; (82) performed work regarding an objection to the notice of
8 deposition of J. Bral; (83) reviewed and analyzed possible settlement of sanctions issue; (84)
9 reviewed and analyzed issues regarding a cross-complaint in the Mission matter, and attended to
10 issues regarding withdrawal of cross-complaint; (85) reviewed and analyzed stay violation issues;
11 (86) reviewed and analyzed the Beitler opposition to motion for contempt; (87) performed work
12 regarding a reply to response to motion relating to violation of the automatic stay; (88) prepared
13 for and attended a status conference on May 8, 2019 in the Westcliff matter; (89) reviewed and
14 analyzed issues regarding hearings set for August 15, 2019; and (90) corresponded and conferred
15 regarding litigation issues.

16 During the Application Period, the Applicant expended 144.50 hours on this category.
17 The amount of fees attributable to this matter is \$115,695.50.

18 **9. Plan and Disclosure Statement**

19 Time billed to this category relates to, among other things: (i) formulating case strategies
20 regarding a plan of reorganization; (ii) preparing a motion to extend the Debtor's exclusive right to
21 file a plan; and (iii) drafting a plan of reorganization and disclosure statement in support thereof.
22 As discussed above, on July 31, 2019, the Court entered the order confirming the Debtor's Fourth
23 Amended Plan.

24 During the Application Period, the Applicant, among other things: (1) reviewed and
25 analyzed exclusivity and timing issues; (2) reviewed and analyzed restructuring options; (3)
26 performed work regarding a scheduling order relating to Plan and Disclosure Statement; (4)
27 performed work regarding negotiations; (5) attended to Plan and Disclosure Statement deadline
28 issues; (6) reviewed and analyzed potential issues to be dealt with in a Plan and Disclosure

1 Statement; (7) reviewed and analyzed Court scheduling order and evidentiary requirements for a
2 Plan and Disclosure Statement; (8) performed work regarding an amended Plan and Disclosure
3 Statement; (9) reviewed and analyzed a transcript of hearing and Court's statements regarding
4 updated information needed for Disclosure Statement; (10) drafted a Disclosure Statement; (11)
5 reviewed and analyzed tax issues related to an amended Disclosure Statement; (12) reviewed and
6 analyzed potential treatment of claims in the Plan and effect of disallowance of certain Beitler
7 party claims; (13) reviewed and analyzed timeline issues; (14) performed work regarding the
8 declaration of Adam Meislik in support of approval of first amended Disclosure Statement; (15)
9 reviewed and analyzed valuation and asset disposition issues; (16) reviewed and analyzed
10 professional fees issues; (17) reviewed and analyzed administrative claims issues; (18) drafted a
11 Plan; (19) performed work regarding evidentiary support for amended Disclosure Statement; (20)
12 reviewed and analyzed Plan structure issues; (21) reviewed and analyzed issues regarding
13 potential separate classification of claims; (22) performed work regarding a first amended Plan
14 and Disclosure Statement; (23) reviewed and analyzed issues regarding the best interests of
15 creditors test; (24) reviewed and analyzed issues regarding the appraisal of Eye Street property;
16 (25) performed work regarding exhibits in support of Plan and Disclosure Statement; (26)
17 performed research; (27) performed work regarding the declaration of Scott Pylf of BBG in
18 support of Westcliff, Mission and Javaher valuations; (28) performed work regarding the
19 declaration of Adam Meislik; (29) performed work regarding the declaration of J. Pyster of Access
20 Appraisers in support of Sandpiper valuation; (30) performed work regarding a reply to opposition
21 to approval of Disclosure Statement; (31) reviewed and analyzed potential confirmation issues and
22 alternative courses of action; (32) reviewed and analyzed the Court's comments regarding a
23 supplement to Disclosure Statement; (33) performed work regarding a schedule of assets and
24 valuation; (34) reviewed and analyzed issues regarding exclusivity deadline issues; (35) reviewed
25 and analyzed a chart of assets to be retained or sold under the Plan; (36) reviewed and analyzed
26 issues regarding a Court-ordered supplement to amended Disclosure Statement; (37) performed
27 work regarding a Supplement to Amended Disclosure Statement; (38) reviewed and analyzed
28 Beitler's opposition to Disclosure Statement; (39) performed work regarding reply to Disclosure

1 Statement objection; (40) performed work regarding the declaration of A. Meislik in support of
2 reply to objections to Disclosure Statement; (41) reviewed and analyzed issues regarding Plan
3 Effective Date; (42) reviewed and analyzed security interest in favor of Michelle Easton; (43)
4 reviewed and analyzed issues regarding claims and additional objections to claims, and potential
5 objections to confirmation; (44) prepared for and attended a hearing on May 31, 2018 regarding
6 adequacy of Disclosure Statement; (45) performed work regarding a Second Amended Disclosure
7 Statement; (46) reviewed and analyzed issues regarding disallowance of claims and right to vote;
8 (47) performed work regarding preparation of responses to potential objections to confirmation;
9 (48) performed work regarding a scheduling order relating to Plan and Disclosure Statement; (49)
10 performed research regarding confirmation issues, and reviewed and revised a second amended
11 Plan and Disclosure Statement; (50) performed work regarding a notice of modifications regarding
12 second amended disclosure statement; (51) reviewed and analyzed confirmation requirements;
13 (52) reviewed and analyzed arguments in opposition to confirmation of Plan; (53) performed work
14 regarding a reply to objections to second amended Disclosure Statement; (54) reviewed and
15 analyzed issues regarding possible conversion of case; (55) reviewed and analyzed legal precedent
16 regarding confirmation issues; (56) performed work regarding an appendix of unpublished cases in
17 support of reply to objection to second amended disclosure statement; (57) reviewed and analyzed
18 evidentiary issues and burdens regarding Plan confirmation; (58) reviewed and analyzed notice
19 regarding hearing on Plan confirmation; (59) performed work regarding a settlement proposal;
20 (60) performed work regarding ballots; (61) performed work regarding a notice of confirmation
21 hearing; (62) performed work regarding a stipulation and order relating to deadlines in Plan
22 confirmation process; (63) performed work regarding an order approving second amended
23 Disclosure Statement; (64) reviewed and analyzed a transcript of hearing on approval of
24 Disclosure Statement; (65) reviewed and analyzed attorneys' lien granted under Plan; (66)
25 performed work regarding Plan solicitation package; (67) performed work regarding a notice of
26 filing of dissemination versions of Plan and Disclosure Statement; (68) reviewed and analyzed a
27 proposed settlement proposal; (69) performed work regarding a mediation letter; (70) reviewed
28 and analyzed mediation issues and performed work regarding a revised letter to mediator; (71)

1 reviewed and analyzed mediation issues; (72) reviewed and analyzed distributions from Westcliff
2 and Mission during Chapter 11 proceedings; (73) reviewed and analyzed tax issues under the Plan;
3 (74) reviewed and analyzed issues regarding a subpoena for William Lobel deposition; (75)
4 performed work regarding a protective order; (76) attended to issues regarding the deposition of
5 M. Easton; (77) performed work regarding a confirmation brief; (78) reviewed and analyzed
6 adversary dockets for four adversary proceedings in preparation for confirmation hearing; (79)
7 attended to issues regarding non-appearance of M. Easton at her deposition; (80) reviewed and
8 analyzed Beitler parties objection to Plan confirmation; (81) reviewed and analyzed the Beitler
9 motion to estimate claims for voting purposes; (82) reviewed and analyzed voting results; (83)
10 reviewed and analyzed the transcript of exclusivity hearing; (84) performed work regarding the
11 declarations of Adam Meislik and John Bral in support of confirmation; (85) reviewed and
12 analyzed comments regarding confirmation brief; (86) performed work regarding confirmation
13 brief supporting documents and supporting evidence; (87) performed work regarding a motion and
14 order to exceed page limits on confirmation brief; (88) performed work regarding a notice of
15 errata relating to Plan confirmation hearing; (89) performed work regarding a notice of vacated
16 hearing on Plan confirmation; (90) reviewed and analyzed issues regarding Beitler's attempt to
17 depose John Bral a second time; (91) reviewed and analyzed evidentiary objections to declaration
18 of Adam Meislik; (92) reviewed and analyzed court decisions regarding Plan and Disclosure
19 Statement issues; (93) performed research regarding a reply to objections to Plan confirmation;
20 (94) drafted a reply to objections to Plan confirmation; (95) performed work regarding a request
21 for judicial notice regarding reply to opposition to confirmation brief; (96) performed work
22 regarding a response to evidentiary objections to Adam Meislik declaration; (97) reviewed and
23 analyzed issues regarding an estimation opposition; (98) performed work regarding an opposition
24 to Beitler parties' motion for order temporarily allowing claims for voting purposes; (99) reviewed
25 and analyzed a deposition notice to Bral and request from Beitler parties for production of
26 documents; (100) reviewed and analyzed issues regarding response to improper discovery
27 propounded by Beitler parties; (101) reviewed and analyzed an order on the motion to temporarily
28 allow claims for voting purposes; (102) performed work regarding objections to second deposition

1 of John Bral and to request for production of documents served by Beitler parties; (103) reviewed
2 and analyzed issues regarding abusive tactics in a deposition as grounds for protective order; (104)
3 performed work regarding a motion for protective order; (105) reviewed and analyzed the Beitler
4 parties response to motion for protective order; (106) performed work regarding a memorandum
5 relating to Plan confirmation preparation; (107) performed work regarding an emergency hearing
6 on motion for protective order relating to deposition; (108) reviewed and analyzed issues
7 regarding release of claims provisions; (109) reviewed and analyzed Beitler creditors opposition
8 to the Debtor's motion for protective order; (110) prepared for and attended a hearing on
9 November 16, 2018 on motion for protective order; (111) drafted an outline, reviewed and
10 analyzed evidentiary issues and performed research in preparation for confirmation hearing; (112)
11 performed work regarding preparation of John Bral for his testimony at the confirmation hearing;
12 (113) reviewed and analyzed bullet points of potential settlement with Beitler; (114) reviewed and
13 analyzed status of settlement negotiations; (115) reviewed and analyzed timing and settlement
14 issues; (116) reviewed and analyzed settlement proposals; (117) reviewed and analyzed settlement
15 options and strategy; (118) performed work regarding a stipulation and order relating to a
16 continuance of confirmation hearing; (119) performed work regarding a settlement agreement;
17 (120) reviewed and analyzed good faith issues; (121) reviewed and analyzed disclosure of
18 financial issues; (122) drafted a brief regarding section 1129(a)(3) issues; (123) prepared for and
19 attended a confirmation hearing and settlement conference on April 30, 2019; (124) reviewed and
20 analyzed issues regarding modification of Plan per settlement; (125) performed work regarding a
21 Third Amended Plan; (126) performed work regarding revisions to Third Amended Plan; (127)
22 performed work regarding a motion for non-material modifications of Plan; (128) performed work
23 regarding a stipulation to continue Plan deadlines; (129) reviewed and analyzed opposition to
24 amended Chapter 11 Plan; (130) performed work regarding a reply to Beitler's opposition to
25 motion for determination regarding modified Plan; (131) prepared for and attended a final
26 confirmation hearing on June 26, 2019; (132) drafted a confirmation order and performed work
27 regarding a Fourth Amended Plan; and (133) corresponded and conferred regarding Plan and
28 Disclosure Statement issues.

1 During the Application Period, the Applicant expended 944.90 hours on this category⁷.
2 The amount of fees attributable to this matter is \$676,382.50.

3 **10. Stay Litigation (combined with Relief from Stay)**

4 Time billed to this category relates to work regarding the automatic stay and relief from
5 stay motions. During the Application Period, the Firm, among other things: (1) reviewed and
6 analyzed issues regarding a stipulation to modify stay relating to arbitrations; (2) reviewed and
7 analyzed stay relief and appellate issues; (3) reviewed and analyzed a motion for relief from stay
8 to proceed with appeal filed by J. Bral; (4) reviewed and analyzed Beitler's response to motion to
9 modify stay; (5) reviewed and analyzed the relief from stay order regarding the Beitler state court
10 action; (6) reviewed and analyzed the Beitler/Boyd motions for relief from stay and performed
11 work regarding a response; (7) performed work regarding exhibits, declarations and an appendix
12 of unpublished opinions in support of response to Beitler/Boyd motions for relief from stay; (8)
13 reviewed and analyzed an order modifying stay to allow appeal to proceed; (9) reviewed and
14 analyzed strategy and scope of issues to be decided in arbitrations; (10) reviewed and analyzed
15 motions for relief from stay regarding arbitrations, and performed work regarding a response; (11)
16 performed work regarding a supplemental status report; (12) performed research regarding stay
17 issues; (13) reviewed and analyzed the Beitler reply to opposition to motions for relief from stay;
18 (14) reviewed and analyzed issues regarding motion to strike declaration and evidence, and
19 performed work regarding evidentiary objections and motion to strike declaration filed in support
20 of reply to opposition to relief from stay motions; (15) reviewed and analyzed opposition to
21 motion to strike; (16) prepared for and attended a hearing on March 8, 2018 regarding motions for
22 relief from stay; (17) reviewed and analyzed transcripts from hearing on motions for relief from
23 stay, and analyzed Court's perspective on what was to be decided in arbitrations; (18) reviewed
24 and analyzed a scheduling order; (19) reviewed and analyzed proposed relief from stay orders
25 related to arbitration, drafted objection to form of orders, and performed work regarding
26 alternative form of orders; (20) reviewed and analyzed an order denying motion to strike Lallas

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28 ⁷ Time billed to this category includes a small amount of uncategorized time incurred in December
2018.

1 declaration; (21) performed work regarding a relief from stay stipulation in the Cannae matter;
2 (22) reviewed and analyzed issues regarding violation of automatic stay and Beitler refusal to
3 dismiss cross complaint; (23) performed work regarding a motion for contempt relating to pending
4 cross-complaint; (24) performed work regarding points and authorities and declarations in support
5 of contempt motion regarding violation of automatic stay; (25) performed work regarding a
6 request for judicial notice in support of contempt motion regarding violation of automatic stay;
7 (26) performed research relating to unpublished cases regarding contempt motion concerning
8 violation of automatic stay and prepared an appendix of unpublished cases in support of motion;
9 (27) reviewed and analyzed Beitler's opposition to stay violation motion and performed work
10 regarding a reply; (28) reviewed and analyzed issues regarding professional fees incurred in
11 connection with contempt motion, and performed work regarding a declaration in support of fees;
12 (29) reviewed and analyzed Beitler response to motion for sanctions and performed work
13 regarding a reply; and (30) corresponded and conferred regarding stay litigation issues.

14 During the Application Period, the Applicant expended 192.90 hours on this category.
15 The amount of fees attributable to this matter is \$134,486.00.

16 **11. Tax Issues**

17 Time billed to this category relates to tax issues. During the Application Period, the Firm,
18 among other things: (1) reviewed and analyzed tax effect of loss of interests in properties; (2)
19 reviewed and analyzed issues regarding unpaid post petition taxes; (3) reviewed and analyzed tax
20 effect of sale of properties; (4) reviewed and analyzed capital gains issues; and (5) reviewed and
21 analyzed tax issues regarding amended Plan.

22 During the Application Period, the Applicant expended 1.70 hours on this category. The
23 amount of fees attributable to this matter is \$1,445.00.

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1 **A. Detailed Listing of all Time Spent by the Professional on the**
2 **Matters for Which Compensation is Sought**

3 Exhibit "A" contains the Firm's detailed time records during the Application Period [LBR
4 2016-1(a)(1)(E)]. Exhibit "B" contains a summary, by category, of the Firm's services and
5 expenses in this case that were incurred during the Application Fee Period. Such summary
6 includes the time spent, rate and billing attributable to each person who performed compensable
7 services for the Debtor [LBR 2016-1(a)(1)(G)].

8 **B. List of Expenses by Category**

9 The costs incurred are summarized in Exhibit "C" attached hereto, which provides a
10 monthly breakdown for the Application Period [LBR 2016-1(a)(1)(F)]. The Firm has not charged
11 the Debtor for any outgoing faxes. The Firm has also charged for unusual expenses, such as
12 travel, court costs and special messenger services, including Federal Express.

13 **C. Hourly Rates**

14 The hourly rates of all professionals and paraprofessionals rendering services in this case
15 during the Application Period are set forth on Exhibit "D" attached hereto [LBR 2016-1(a)(1)(G)
16 and (I)].

17 **D. Professional Education and Experience**

18 Descriptions of the professional education and experience of each of the professionals'
19 rendering service in this case during the Application Period are set forth on Exhibit "E" attached
20 hereto [LBR 2016-1(a)(1)(H)].

21 **E. Separately Filed Declaration of the Client**

22 Applicant will separately file a declaration from the client indicating that the client has
23 reviewed the fee application and has no objection to it [LBR 2016-1(a)(1)(J)].

24 **F. Statement of the Applicant Regarding Compliance with LBR 2016-1**

25 The attached declaration of William N. Lobel sets forth that the Applicant has reviewed
26 LBR 2016-1 and that this Application is in compliance with such rule [LBR 2016-1(a)(1)(K)].

1 **G. No Fee Sharing**

2 No agreement has been made by any member of the Firm or by any employee thereof,
3 directly or indirectly, and no understanding exists for a division of fees prayed for herein with any
4 other person, except that the Firm may agree to share a portion of the fees it is ultimately paid with
5 the Debtor, solely as a "gift" to the Debtor. If and when such a decision is made, and prior to
6 actually disbursing any funds to the Debtor, the Firm will file a notice of such proposed
7 disbursement with the Court.

8 **V. THE FEES AND EXPENSES REQUESTED SHOULD BE AWARDED**
9 **BASED UPON APPLICABLE LAW**

10 The fees and expenses requested by this Application are an appropriate award for the
11 Applicant's services in acting as general bankruptcy counsel to the Debtor.

12 **A. Factors in Evaluating Requests for Compensation**

13 Pursuant to section 330 of the Bankruptcy Code, the Court may award to a professional
14 person reasonable compensation for actual, necessary services rendered, and reimbursement for
15 actual, necessary expenses incurred. As set forth above, the fees for which the Applicant requests
16 compensation and the costs incurred for which the Applicant requests reimbursement are for
17 actual and necessary services rendered and costs incurred in the case.

18 During the Application period 2,246.80 hours have been recorded by members of the
19 Applicant and more time was actually expended but either was not recorded or was written off.
20 The Applicant's blended hourly rate in the case for the Application Period including
21 paraprofessionals is \$709.59.

22 Moreover, time and labor devoted is only one of many pertinent factors in determining an
23 award of fees and costs. Based on the skills brought to bear in the case by the Applicant and the
24 results obtained and in light of the accepted lodestar approach, the Applicant submits that the
25 compensation requested herein is reasonable and appropriate.

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1 **B. The Lodestar Award Should be Calculated by Multiplying
2 a Reasonable Hourly Rate by the Hours Expended**

3 In determining the amount of allowable fees under section 330(a) of the Bankruptcy Code,
4 courts are to be guided by the same “general principles” as are to be applied in determining awards
5 under the federal fee-shifting statutes, with “some accommodation to the peculiarities of
6 bankruptcy matters.” *In re Manoa Finance Co., Inc.*, 853 F.2d 687, 691 (9th Cir. 1988); *see*
7 *Meronk v. Arter & Hadden, LLP (In re Meronk)*, 249 B.R. 208, 213 (B.A.P. 9th Cir. 2000)
8 (reiterating that *Manoa Finance* is the controlling authority and characterizing the factor test⁸
9 identified in *Johnson v. Georgia Highway Express, Inc.* 488 F.2d 714 (5th Cir. 1974) and *Kerr v.*
10 *Screen Extras Guild, Inc.* 526 F. 2d 67, 70 (9th Cir. 1975), *cert. denied*, 425 U.S. 951 (1976) as an
11 “obsolete laundry list” now subsumed within more refined analyses).

12 The United States Supreme Court has evaluated the lodestar approach and endorses its
13 usage. In *Hensley v. Eckerhart*, 461 U.S. 424 (1983), a civil rights case, the Supreme Court held
14 that while the *Johnson* factors might be considered in setting fees, the lodestar amount subsumed
15 many of those factors. *Hensley* at 434, n. 9.⁹ The following year, another civil rights case, *Blum*
16 *vs. Stenson*, 465 U.S. 886 (1984), provided the so-called lodestar calculation:

17 The initial estimate of a reasonable attorney’s fee is properly
18 calculated by multiplying the number of hours reasonably expended
19 on the litigation times a reasonable hourly rate Adjustments to
20 that fee then may be made as necessary in the particular case.

21 ⁸ The original twelve Johnson/Kerr factors were: (1) time and labor required, (2) novelty and
22 difficulty of the questions involved, (3) skill requisite to perform the legal services properly, (4)
23 the preclusion of other employment by the attorney due to acceptance of the case, (5) the
24 customary fee, (6) whether the fee is fixed or contingent, (7) time limitations imposed by the client
25 or the circumstances, (8) amount involved and results obtained, (9) experience, reputation, and
26 ability of the attorneys (10) the “undesirability” of the case, (11) nature and length of the
27 professional relationship with client, and (12) awards in similar cases.

28 ⁹ For discussion of the Johnson/Kerr subsumed factors, see *Morales v. City of San Rafael*, 96 F.3d
29 359, 364 n.9 (9th Cir. 1996) (“among the subsumed factors . . . are: (1) the novelty and complexity
30 of the issues, (2) the special skill and experience of counsel, (3) the quality of representation, and
31 (4) the results obtained”); *Davis v. City & County of San Francisco*, 976 F.2d 1536, 1549 (9th Cir.
32 1992), *vacated in part on other grounds*, 984 F.2d 345 (9th Cir. 1993) (extending *City of Burlington*
33 *v. Dague*, 505 U.S. 557, 567 (1992), which held that sixth factor “whether the fee is fixed or
34 contingent, may not be considered in the lodestar calculation”).

1 *Blum* at 888.

2 Then in 1986, the Supreme Court more explicitly indicated that the factors relevant to
3 determining fees should be applied using the lodestar approach, rather than an ad hoc approach.
4 While holding that the attorney's fee provision of the Clean Air Act, 42 U.S.C. § 7401 et seq.,
5 should be interpreted like that of the Civil Rights Act, the Supreme Court expressly rejected the ad
6 hoc application of the factors set forth in *Johnson* and thus *Kerr*, stating that "the lodestar figure
7 includes most, if not all, of the relevant factors constituting a 'reasonable' attorney's fee" *Pennsylvania v. Del. Valley Citizens' Council for Clean Air*, 478 U.S. 546, 563-66 (1986); see
8 also *Blanchard v. Bergeron*, 489 U.S. 87, 94 (1989) ("we have said repeatedly that the initial
9 estimate of a reasonable attorney's fee is properly calculated by multiplying the number of hours
10 reasonably expended on the litigation times a reasonable hourly rate").

12 While the lodestar approach is the primary basis for determining fee awards under the
13 federal fee-shifting statutes and Bankruptcy Code, some of the *Johnson/Kerr* factors, previously
14 applied in an ad hoc fashion, can still apply in calculating the appropriate hourly rate to use under
15 the lodestar approach. *Buckridge*, 367 B.R. 191, 201 (C.D. Cal. 2007) ("a court is permitted to
16 adjust the lodestar up or down using a multiplier based on the criteria listed in § 330 and its
17 consideration of the Kerr factors not subsumed within the initial calculations of the lodestar");
18 *Dang v. Cross*, 422 F.3d 800, 812 (9th Cir. 2005) (court may "adjust the lodestar amount after
19 considering other factors that bear on the reasonableness of the fee"); *Unsecured Creditors' Comm. v. Puget Sound Plywood, Inc.*, 924 F.2d 955, 960 (9th Cir. 1991) ("Although *Manoa*
21 suggests that starting with the 'lodestar' is customary, it does not mandate such an approach in all
22 cases.... Fee shifting cases are persuasive, but due to the uniqueness of bankruptcy proceedings,
23 they are not controlling").

24 Attached hereto as **Exhibit "A"** is a copy of the Applicant's time reports and records kept
25 in the regular course of business reflecting the services rendered and the expenses incurred by the
26 Applicant during the Application Period. The Applicant's time reports are initially handwritten or
27 recorded via computer by the attorney or paralegal performing the described services. The time
28 reports are organized on a daily basis. The Applicant is sensitive to issues of "lumping," and

unless time was spent in one time frame on a variety of different matters, separate time entries are set forth in the time reports. The Applicant's charges for its professional services are based upon the time, nature, extent and value of such services and the cost of comparable services in the Southern California region, other than in a case under the Bankruptcy Code.

5 The Debtor has efficiently administered the case pending resolution of the Adversary
6 Matters and State Court Action. This is due in significant part to the Applicant's role as counsel to
7 the Debtor and their joint efforts to achieve the best possible results under the circumstances.

VI.

CONCLUSION

This is the Applicant's first request and final request for compensation. The Applicant believes that the services rendered for which compensation is sought in this Application have been beneficial to the estate, that the costs incurred have been necessary and proper, and that the sums requested for the services rendered and the costs incurred are fair and reasonable.

5 **WHEREFORE**, Pachulski Stang Ziehl & Jones LLP respectfully requests that this Court
6 (1) allow on a final basis fees in the total amount of \$1,594,301.50 and reimbursement of costs in
7 the total amount of \$31,846.35 for the period January 1, 2018, through and including July 31, 2019
8 for a total award of \$1,626,147.85; and (2) authorize payment to the Applicant in the amount of
\$1,626,147.85.

Dated: September 12, 2019

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ William N. Lobel
William N. Lobel
Special Reorganization Counsel to Debtor and
Debtor-in-Possession John J. Bral

DECLARATION OF WILLIAM N. LOBEL

I, William N. Lobel, declare as follows:

1. I am an attorney at law duly authorized to practice in the State of California and before this Court. I am a Partner in the law firm of Pachulski Stang Ziehl & Jones LLP, general bankruptcy counsel to the Debtor.

2. I have personal knowledge of the facts set forth in the foregoing Application and, if called upon as a witness, I could and would competently testify as to all of the matters stated therein.

3. I have personally reviewed the information contained in the Application, and believe its contents to be true and correct to the best of my knowledge, information and belief.

4. The Firm customarily charges \$.20 per page for photocopying expenses. The Firm's photocopying machines automatically record the number of copies made when the person that is doing the copying enters the client's account number into a device attached to the photocopier. The Firm summarizes each client's photocopying charges on a daily basis. Whenever feasible, the Firm sends large copying projects to an outside copy service that charges a reduced rate for photocopying.

5. The Firm customarily charges \$.10 for scanned copies. The Firm's photocopying machines automatically record the number of scanned copies made when the person that is doing the copying enters the client's account number into a device attached to the photocopier. The Firm summarizes each client's scanned charges on a daily basis.

6. The Firm ordinarily charges \$1.00 per page for out-going facsimile transmissions.

7. Regarding providers of on-line legal research (e.g., LEXIS and WESTLAW), the Firm charges the standard usage rates these providers charge for computerized legal research. The Firm bills its clients the actual cash charged by such services, with no premium. Any volume discount received by the Firm is passed on to the client.

8. The Firm does not charge for local or long distance calls placed by attorneys from their offices. The Firm only bills its clients for the actual costs charged the Firm by teleconferencing services in the event that a multiple party teleconference is initiated through the

1 Firm.

2 9. The Firm believes the foregoing rates are the market rates that the majority of law
3 firms charge clients for such services. In addition, the Firm believes that such charges are in
4 accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's
5 Statement of Principles, dated January 12, 1995.

6 10. I have personally reviewed the bills in this matter, and the bills represent true and
7 correct charges to the best of my knowledge, information and belief.

8 11. Local Bankruptcy Rule 2016-1(a)(1)(K) Compliance: I have reviewed Local
9 Bankruptcy Rule 2016-1 and the Application complies with Local Bankruptcy Rule 2016-1.

10 12. No agreement has been made by any member of the Firm or by any employee
11 thereof, directly or indirectly, and no understanding exists for a division of fees prayed for herein
12 with any other person, except that the Firm may agree to share a portion of the fees it is ultimately
13 paid with the Debtor, solely as a "gift" to the Debtor. If and when such a decision is made, and
14 prior to actually disbursing any funds to the Debtor, the Firm will file a notice of such proposed
15 disbursement with the Court.

16 I declare under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct.

18 Executed this 12th day of September at Costa Mesa, California.

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/s/ William N. Lobel
William N. Lobel

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EXHIBIT “A”

Pachulski Stang Ziehl & Jones LLP

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

January 31, 2018
Invoice 118521
Client 10601
Matter 00001
WNL

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 01/31/2018

FEES	\$64,977.50
EXPENSES	\$1.40
TOTAL CURRENT CHARGES	\$64,978.90
TOTAL BALANCE DUE	\$64,978.90

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
0100	General Case Administration	0.40	\$150.00
AA	Asset Analysis/Recovery[B120]	1.80	\$1,530.00
AD	Asset Disposition [B130]	3.70	\$3,145.00
BL	Bankruptcy Litigation [L430]	9.00	\$7,650.00
CA	Case Administration [B110]	1.40	\$762.50
CO	Claims Admin/Objections[B310]	7.50	\$5,567.50
F	Fees of Professionals	0.30	\$112.50
LN	Litigation (Non-Bankruptcy)	49.40	\$41,262.50
PD	Plan & Disclosure Stmt. [B320]	1.20	\$1,020.00
SL	Stay Litigation [B140]	4.50	\$3,777.50
		88.80	\$64,977.50

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
NPL	Lockwood, Nancy P. F.	Paralegal	0.00	7.50	\$0.00
NPL	Lockwood, Nancy P. F.	Paralegal	375.00	3.50	\$1,312.50
TCF	Flanagan, Tavi C.	Counsel	0.00	2.10	\$0.00
TCF	Flanagan, Tavi C.	Counsel	650.00	3.40	\$2,210.00
WNL	Lobel, William N.	Partner	850.00	72.30	\$61,455.00
				88.80	\$64,977.50

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Pacer - Court Research	\$1.40
	\$1.40

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/05/2018	NPL	Confer with W. Lobel regarding application to employ Pachulski Stang Ziehl & Jones as special counsel to the debtor; confer with L. Gauthier regarding same. (NO CHARGE)	0.20	0.00	\$0.00
01/11/2018	NPL	Prepare application to employ Pachulski Stang Ziehl & Jones as special reorganization counsel to the Debtor; draft email to T. Flanagan regarding same. (NO CHARGE)	3.60	0.00	\$0.00
01/12/2018	NPL	Review and Reply to email from T. Flanagan regarding application to employ Pachulski Stang Ziehl & Jones as special reorganization counsel. (NO CHARGE)	0.10	0.00	\$0.00
01/16/2018	NPL	Review multiple emails from T. Flanagan regarding updates and revisions to application to employ Pachulski Stang Ziehl & Jones as special reorganization counsel. (NO CHARGE)	0.10	0.00	\$0.00
01/16/2018	NPL	Update and revise application to employ Pachulski Stang Ziehl & Jones as special reorganization counsel. (NO CHARGE)	0.30	0.00	\$0.00
01/29/2018	NPL	Confer with L. Gauthier and A. Friedman regarding status of application. (NO CHARGE)	0.30	0.00	\$0.00
01/30/2018	NPL	Prepare notice of application to employ Pachulski Stang Ziehl & Jones as special insolvency counsel for the Debtor. (NO CHARGE)	0.30	0.00	\$0.00
01/31/2018	NPL	Draft email to W. Lobel regarding updated and revised application to employ Pachulski Stang Ziehl & Jones as special reorganization counsel. (NO CHARGE)	0.10	0.00	\$0.00
01/31/2018	NPL	Draft email to J. Bral regarding application to employ Pachulski Stang Ziehl & Jones as special reorganization counsel. (NO CHARGE)	0.10	0.00	\$0.00
01/31/2018	NPL	Telephone call with J. Bral regarding application to employ Pachulski Stang Ziehl & Jones as special counsel to the debtor; review and reply to email from J. Bral regarding same. (NO CHARGE)	0.10	0.00	\$0.00
01/31/2018	NPL	Revise and finalize notice of application to employ Pachulski Stang Ziehl & Jones as special counsel; prepare service list to same. (NO CHARGE)	0.40	0.00	\$0.00
01/31/2018	NPL	Review and reply to multiple emails from W. Lobel regarding multiple revisions to application to employ Pachulski Stang Ziehl & Jones as special counsel; update, revise and finalize same. (NO CHARGE)	1.70	0.00	\$0.00
01/31/2018	NPL	Prepare firm biographies for inclusion of application to employ Pachulski Stang Ziehl & Jones as special counsel. (NO CHARGE)	0.20	0.00	\$0.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
General Case Administration						
01/17/2018	NPL	0100	Review critical date and deadline memorandum; attention to dates and deadlines regarding same.	0.40	375.00	\$150.00
				0.40		\$150.00

Asset Analysis/Recovery[B120]

01/31/2018	WNL	AA	Review and analyze B. Beitler's statement of genuine issues in opposition to avoidance complaint.	0.10	850.00	\$85.00
01/31/2018	WNL	AA	Review and respond to correspondence regarding effect of Hilde case on motion to avoid liens based on charging orders.	0.30	850.00	\$255.00
01/31/2018	WNL	AA	Review and analyze arguments made in response to motion to avoid charging liens.	0.40	850.00	\$340.00
01/31/2018	WNL	AA	Review and analyze Beitler's statements of disputed and undisputed facts regarding motion for summary judgment avoiding charging liens.	0.40	850.00	\$340.00
01/31/2018	WNL	AA	Review and respond to correspondence regarding response to motion for summary judgment filed by Beitler.	0.10	850.00	\$85.00
01/31/2018	WNL	AA	Review and analyze in re: Jaffe regarding perfection of charging lien.	0.40	850.00	\$340.00
01/31/2018	WNL	AA	Review correspondence regarding legal issues concerning timing of perfection of a charging lien.	0.10	850.00	\$85.00
				1.80		\$1,530.00

Asset Disposition [B130]

01/02/2018	WNL	AD	Review and analyze correspondence and issues regarding potential sale of Westcliff.	0.20	850.00	\$170.00
01/03/2018	WNL	AD	Review offer to purchase Westcliff.	0.10	850.00	\$85.00
01/03/2018	WNL	AD	Review correspondence regarding offer to purchase Westcliff.	0.20	850.00	\$170.00
01/03/2018	WNL	AD	Review correspondence regarding discovery requests and issues.	0.40	850.00	\$340.00
01/03/2018	WNL	AD	Analyze legal and factual issues concerning potential sales of various properties.	0.40	850.00	\$340.00
01/04/2018	WNL	AD	Review proposed response to D. Rezak re: offer to purchase Westcliff.	0.10	850.00	\$85.00
01/04/2018	WNL	AD	Review proposed response regarding offer to purchase Westcliff.	0.10	850.00	\$85.00
01/05/2018	WNL	AD	Review proposed terms of offer to purchase Westcliff.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/05/2018	WNL	AD	Review revised response to D. Rezak regarding offer to purchase Westcliff.	0.10	850.00	\$85.00
01/05/2018	WNL	AD	Review correspondence regarding offers to purchase Westcliff.	0.10	850.00	\$85.00
01/11/2018	WNL	AD	Review correspondence regarding offer to purchase Westcliff.	0.20	850.00	\$170.00
01/11/2018	WNL	AD	Review additional correspondence regarding offer to purchase Westcliff.	0.10	850.00	\$85.00
01/18/2018	WNL	AD	Analyze issues and consider action to be taken with respect to proposed sales of various assets.	0.20	850.00	\$170.00
01/19/2018	WNL	AD	Review correspondence re sale of Westcliff	0.10	850.00	\$85.00
01/19/2018	WNL	AD	Review additional correspondence re: disposition and Westcliff arbitration.	0.10	850.00	\$85.00
01/19/2018	WNL	AD	Review draft of e-mail to G. Klausner re: lack of response by B. Beitler re:potential sale of Westcliff.	0.10	850.00	\$85.00
01/19/2018	WNL	AD	Comment on draft e-mail to G. Klausner	0.10	850.00	\$85.00
01/19/2018	WNL	AD	Review additional correspondence re: offer to purchase Westcliff property	0.20	850.00	\$170.00
01/19/2018	WNL	AD	Analyze issues concerning sale of various properties.	0.50	850.00	\$425.00
01/19/2018	WNL	AD	Review correspondence regarding potential sale of Westcliff.	0.10	850.00	\$85.00
01/22/2018	WNL	AD	Review correspondence regarding response to offers to buy Westcliff.	0.10	850.00	\$85.00
01/23/2018	WNL	AD	Review correspondence regarding proposed sale of Westcliff.	0.10	850.00	\$85.00
				3.70	\$3,145.00	

Bankruptcy Litigation [L430]

01/02/2018	WNL	BL	Review and analyze issues concerning scope of discovery involved in pending arbitrations.	0.80	850.00	\$680.00
01/02/2018	WNL	BL	Analyze issues concerning Westcliff arbitration	0.40	850.00	\$340.00
01/18/2018	WNL	BL	Analyze issues and review correspondence regarding pending discovery disputes.	0.50	850.00	\$425.00
01/22/2018	WNL	BL	Review and analyze issues regarding discovery disputes regarding discovery in pending arbitrations.	0.60	850.00	\$510.00
01/22/2018	WNL	BL	Analyze potential discovery to be propounded on Beitler parties.	0.70	850.00	\$595.00
01/23/2018	WNL	BL	Analyze issues and consider alternative courses of action regarding motion to strike evidence.	0.60	850.00	\$510.00
01/25/2018	WNL	BL	Analyze additional discovery issues and consider bases for objecting to discovery requests.	0.80	850.00	\$680.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/25/2018	WNL	BL	Review correspondence and analyze issues regarding equity contributions of J. Bral.	0.70	850.00	\$595.00
01/25/2018	WNL	BL	Analyze additional discovery issues.	0.40	850.00	\$340.00
01/25/2018	WNL	BL	Consider alternative courses of action regarding discovery in pending arbitrations.	0.60	850.00	\$510.00
01/26/2018	WNL	BL	Consider discovery to be propounded to Beitler parties.	0.80	850.00	\$680.00
01/29/2018	WNL	BL	Review documents to be produced to Beitler parties.	0.70	850.00	\$595.00
01/30/2018	WNL	BL	Review additional correspondence and proposed discovery requests.	0.60	850.00	\$510.00
01/30/2018	WNL	BL	Review and analyze drafts of responses to requests for discovery.	0.80	850.00	\$680.00
				9.00		\$7,650.00

Case Administration [B110]

01/03/2018	NPL	CA	Review multiple emails from L. Gauthier regarding critical date and deadline memorandum; review same; attention to outstanding dates and deadlines regarding same.	0.60	375.00	\$225.00
01/10/2018	WNL	CA	Review updated critical dates summary.	0.10	850.00	\$85.00
01/10/2018	NPL	CA	Review case file; prepare case summary regarding same; draft email to W. Lobel regarding same.	0.30	375.00	\$112.50
01/12/2018	WNL	CA	Review monthly operating statement for December 2017.	0.10	850.00	\$85.00
01/17/2018	WNL	CA	Review updated critical dates summary.	0.10	850.00	\$85.00
01/19/2018	WNL	CA	Review revised critical dates summary	0.10	850.00	\$85.00
01/26/2018	WNL	CA	Review revised critical date summary.	0.10	850.00	\$85.00
				1.40		\$762.50

Claims Admin/Objections[B310]

01/02/2018	NPL	CO	Draft email to S. O'Keefe regarding notice of subpoenas to Beitler & Co., T. Lallas, and G. Klausner regarding objections to claim nos. 14 and 16.	0.10	375.00	\$37.50
01/02/2018	NPL	CO	Confer with L. Gauthier regarding status of outstanding discovery regarding Bral objection to Claim Nos. 14 and 16.	0.10	375.00	\$37.50
01/03/2018	WNL	CO	Review correspondence regarding third party discovery regarding motion to strike.	0.10	850.00	\$85.00
01/03/2018	WNL	CO	Review correspondence regarding subpoenas to be issued in connection with objections to claims.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/04/2018	WNL	CO	Review and analysis of correspondence re: issuance of subpoenas.	0.10	850.00	\$85.00
01/11/2018	WNL	CO	Review correspondence regarding extension of deadline for B. Samini to respond to objection to his claim.	0.10	850.00	\$85.00
01/12/2018	WNL	CO	Review and analysis of order continuing hearing on objection to Samini claim.	0.10	850.00	\$85.00
01/12/2018	WNL	CO	Review requests for production in support of objections to claims.	0.20	850.00	\$170.00
01/12/2018	NPL	CO	Telephone conference with J. Bral regarding discovery for objection to claim nos. 14 and 16.	1.20	375.00	\$450.00
01/12/2018	NPL	CO	Review email from L. Gauthier regarding discovery requests.	0.10	375.00	\$37.50
01/15/2018	WNL	CO	Review and analysis of correspondence regarding motion for summary judgment.	0.10	850.00	\$85.00
01/15/2018	WNL	CO	Review and analysis of correspondence regarding responses and other pleadings regarding motion for summary judgment.	0.10	850.00	\$85.00
01/15/2018	WNL	CO	Office conference with A. Friedman and S. O'Keefe regarding various issues and action to be taken.	1.10	850.00	\$935.00
01/22/2018	NPL	CO	Review emails regarding discovery dispute regarding objections to claim nos. 14 and 16.	0.10	375.00	\$37.50
01/28/2018	WNL	CO	Analyze discovery and strategy regarding fraud allegations and claim objections.	0.50	850.00	\$425.00
01/29/2018	NPL	CO	Review objection of Levene Neale to subpoena; office conference with A. Friedman regarding same.	0.10	375.00	\$37.50
01/30/2018	WNL	CO	Review correspondence regarding declarations needed to support claims objections.	0.10	850.00	\$85.00
01/30/2018	WNL	CO	Confer with A. Friedman regarding issues concerning objections to claims.	0.20	850.00	\$170.00
01/30/2018	WNL	CO	Conferences with A. Friedman regarding issues concerning claims objections and action to be taken.	0.40	850.00	\$340.00
01/31/2018	WNL	CO	Review and analyze compendium of evidence regarding discovery dispute.	0.30	850.00	\$255.00
01/31/2018	WNL	CO	Review and analyze Boyd response to motion to strike her claim.	0.20	850.00	\$170.00
01/31/2018	WNL	CO	Review declaration of M. Hurwitz to motion to strike his claim.	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Review declarations filed by T. Lallas and B. Beitler in opposition to motion to strike claim.	0.20	850.00	\$170.00
01/31/2018	WNL	CO	Review J. Bral's statement in joint statement regarding Westcliff arbitration	0.20	850.00	\$170.00
01/31/2018	WNL	CO	Review correspondence regarding changes to motion	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			attached to Lobel declaration.			
01/31/2018	WNL	CO	Review correspondence regarding signature page for declaration.	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Review correspondence regarding documents produced by B. Beitler.	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Review changes to declaration of B. Gaschen and related correspondence.	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Review correspondence regarding changes to declaration of W. Lobel.	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Review additional correspondence regarding changes to declaration of W. Lobel.	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Review correspondence regarding compendium of evidence.	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Review correspondence regarding claims being objected to.	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Review declaration of S. O'Keefe in support of statements in joint statement regarding objections to discovery requests.	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Review correspondence regarding lack of evidence claims.	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Review correspondence regarding documents produced to B. Beitler	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Confer with A. Friedman regarding document production issues.	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Review draft declaration of W. Lobel in support of objections to claims.	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Review and execute declaration of W. Lobel regarding claims objections.	0.10	850.00	\$85.00
01/31/2018	WNL	CO	Review correspondence regarding discovery issues.	0.20	850.00	\$170.00
				<u>7.50</u>		<u>\$5,567.50</u>

Fees of Professionals

01/31/2018	NPL	F	Attention to the review and analysis of professional fees for W. Lobel.	0.30	375.00	\$112.50
				<u>0.30</u>		<u>\$112.50</u>
01/16/2018	TCF	FE	Draft employment application and address related matters. (No Charge)	1.80	0.00	\$0.00
01/16/2018	TCF	FE	Draft declaration in support of employment application. (No Charge)	0.30	0.00	\$0.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Litigation (Non-Bankruptcy)						
01/02/2018	WNL	LN	Review correspondence regarding discovery to be propounded	0.10	850.00	\$85.00
01/02/2018	WNL	LN	Review and execute subpoenas.	0.10	850.00	\$85.00
01/02/2018	WNL	LN	Review and analyze correspondence regarding discovery issues.	0.40	850.00	\$340.00
01/02/2018	WNL	LN	Review proposed discovery to be propounded/	0.40	850.00	\$340.00
01/03/2018	WNL	LN	Review and comment on proposed discovery.	0.60	850.00	\$510.00
01/03/2018	WNL	LN	Review correspondence regarding Westcliff Arbitration.	0.20	850.00	\$170.00
01/03/2018	WNL	LN	Review correspondence regarding discovery to be propounded.	0.10	850.00	\$85.00
01/03/2018	WNL	LN	Review correspondence regarding Westfield arbitration.	0.10	850.00	\$85.00
01/03/2018	WNL	LN	Review notices of subpoena.	0.10	850.00	\$85.00
01/03/2018	WNL	LN	Telephone call with T. Flanagan regarding action to be taken.	0.10	850.00	\$85.00
01/03/2018	WNL	LN	Review correspondence from AAA regarding pending arbitration.	0.10	850.00	\$85.00
01/03/2018	WNL	LN	Review additional correspondence regarding subpoenas.	0.10	850.00	\$85.00
01/03/2018	WNL	LN	Confer with A. Friedman regarding discovery and related issues.	0.20	850.00	\$170.00
01/03/2018	WNL	LN	Review additional correspondence regarding Westcliff arbitration.	0.10	850.00	\$85.00
01/03/2018	TCF	LN	Review and analysis of issues related to Westcliff arbitration and discovery matters.	0.10	650.00	\$65.00
01/03/2018	TCF	LN	Review and analysis of discovery related issues.	0.10	650.00	\$65.00
01/04/2018	WNL	LN	Review Westcliff arbitration issues.	0.40	850.00	\$340.00
01/04/2018	WNL	LN	Review correspondence regarding discovery issues.	0.20	850.00	\$170.00
01/04/2018	WNL	LN	Review proposed discovery to be propounded on Beitler parties.	1.30	850.00	\$1,105.00
01/04/2018	WNL	LN	Review correspondence regarding subpoenas.	0.10	850.00	\$85.00
01/05/2018	WNL	LN	Review and comment on proposed discovery.	0.80	850.00	\$680.00
01/05/2018	WNL	LN	Review information regarding Westcliff arbitration.	0.20	850.00	\$170.00
01/05/2018	WNL	LN	Confer with A. Friedman regarding discovery issues.	0.40	850.00	\$340.00
01/05/2018	WNL	LN	Review requests for exchange of information.	0.10	850.00	\$85.00
01/05/2018	WNL	LN	Review correspondence regarding violation of stay and response thereto.	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/05/2018	WNL	LN	Confer with A. Friedman regarding appeal issues.	0.10	850.00	\$85.00
01/05/2018	WNL	LN	Telephone conference with A. Friedman regarding discovery issues for arbitration.	0.20	850.00	\$170.00
01/05/2018	WNL	LN	Review correspondence regarding scope of discovery allowed in arbitration.	0.10	850.00	\$85.00
01/05/2018	WNL	LN	Review and analyze discovery propounded by Beitler.	1.10	850.00	\$935.00
01/05/2018	WNL	LN	Review subpoenas for bank records.	0.10	850.00	\$85.00
01/05/2018	WNL	LN	Review and comment on proposed discovery.	0.80	850.00	\$680.00
01/05/2018	WNL	LN	Review correspondence regarding scope of discovery in arbitration.	0.20	850.00	\$170.00
01/05/2018	WNL	LN	Review discovery propounded on Beitler.	0.80	850.00	\$680.00
01/05/2018	WNL	LN	Review revised letter to T. Lallas regarding unauthorized discovery.	0.10	850.00	\$85.00
01/05/2018	TCF	LN	Correspondence with A. Friedman regarding discovery issues.	0.10	650.00	\$65.00
01/07/2018	TCF	LN	Correspondence with A. Friedman and S. O'Keefe regarding discovery matters.	0.10	650.00	\$65.00
01/07/2018	TCF	LN	Review and analysis of discovery matters.	0.30	650.00	\$195.00
01/08/2018	WNL	LN	Review summary of deadlines regarding Westcliff arbitrations.	0.10	850.00	\$85.00
01/08/2018	WNL	LN	Review discovery propounded by Beitler in Westcliff arbitration.	0.80	850.00	\$680.00
01/08/2018	WNL	LN	Review correspondence regarding Beitler discovery.	0.10	850.00	\$85.00
01/08/2018	WNL	LN	Review answering statement in Mission arbitration.	0.10	850.00	\$85.00
01/08/2018	WNL	LN	Review summary of pending deadlines in Westcliff arbitration.	0.10	850.00	\$85.00
01/08/2018	WNL	LN	review correspondence regarding discovery propounded in Westcliff arbitration.	0.10	850.00	\$85.00
01/08/2018	WNL	LN	Review discovery propounded by B. Beitler in Westcliff arbitration.	0.90	850.00	\$765.00
01/09/2018	WNL	LN	Review correspondence and answering statement in Mission arbitration.	0.20	850.00	\$170.00
01/10/2018	WNL	LN	Review correspondence regarding responses to discovery propounded by Beitler.	0.10	850.00	\$85.00
01/10/2018	TCF	LN	Review and analysis of discovery issues and correspondence with respect thereto.	0.10	650.00	\$65.00
01/11/2018	WNL	LN	Review and analyze discovery requests propounded by Beitler.	1.40	850.00	\$1,190.00
01/11/2018	TCF	LN	Correspondence with A. Friedman regarding discovery and arbitration issues.	0.10	650.00	\$65.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/11/2018	TCF	LN	Review and analysis of discovery and arbitration issues.	0.20	650.00	\$130.00
01/12/2018	WNL	LN	Review correspondence regarding arbitration issues.	0.20	850.00	\$170.00
01/12/2018	WNL	LN	Confer with A. Friedman and S. O'Keefe regarding discovery issues.	0.80	850.00	\$680.00
01/12/2018	WNL	LN	Review answering statement of Beitler parties in arbitration.	0.20	850.00	\$170.00
01/12/2018	WNL	LN	Review correspondence regarding scope of representation in arbitration.	0.10	850.00	\$85.00
01/12/2018	WNL	LN	Review correspondence and analyze discovery issues.	0.90	850.00	\$765.00
01/12/2018	WNL	LN	Review and analysis of correspondence regarding need to amend Mission arbitration statement.	0.10	850.00	\$85.00
01/12/2018	WNL	LN	Conference call regarding responses to pending discovery.	1.20	850.00	\$1,020.00
01/12/2018	WNL	LN	Telephone conference with G. Klausner regarding various pending issues.	0.50	850.00	\$425.00
01/12/2018	WNL	LN	Confer with A. Friedman regarding various pending issues.	0.40	850.00	\$340.00
01/12/2018	NPL	LN	Review arbitration statement filed by B. Beitler in Bral v. Westcliff civil matter.	0.10	375.00	\$37.50
01/15/2018	WNL	LN	Confer with A. Friedman and S. O'Keefe regarding discovery issues and litigation strategies.	0.60	850.00	\$510.00
01/15/2018	WNL	LN	Analyze issues and potential discovery regarding fraud claim.	0.80	850.00	\$680.00
01/15/2018	WNL	LN	Review and analysis of correspondence regarding suggested depositions.	0.10	850.00	\$85.00
01/15/2018	WNL	LN	Review and analysis of correspondence regarding issues raised by proposed stipulation regarding scope of arbitration.	0.10	850.00	\$85.00
01/15/2018	TCF	LN	Correspondence to A. Friedman regarding motion for summary judgment on 544 issues.	0.10	650.00	\$65.00
01/15/2018	TCF	LN	Review and analysis of issues regarding motion for summary judgment on 544 issues.	0.10	650.00	\$65.00
01/15/2018	TCF	LN	Correspondence with A. Friedman regarding motion for summary judgment on 544 issues.	0.10	650.00	\$65.00
01/16/2018	WNL	LN	Review correspondence regarding discovery issues.	0.20	850.00	\$170.00
01/16/2018	WNL	LN	Analyze issues regarding arbitration discovery.	0.60	850.00	\$510.00
01/16/2018	WNL	LN	Review and analysis of documents to be given to Beitler in response to discovery requests.	0.30	850.00	\$255.00
01/16/2018	WNL	LN	Review and analysis of correspondence regarding production of check register.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/16/2018	WNL	LN	Review and analysis of additional correspondence regarding arbitration issues.	0.10	850.00	\$85.00
01/16/2018	WNL	LN	Review and analysis of correspondence regarding plan of action for discovery and related issues.	0.10	850.00	\$85.00
01/16/2018	WNL	LN	Review and analysis of correspondence regarding scope of representation of parties in arbitration.	0.10	850.00	\$85.00
01/16/2018	WNL	LN	Review and analysis of correspondence regarding scope of issues in arbitration.	0.10	850.00	\$85.00
01/16/2018	TCF	LN	Review and analysis of discovery matter.	1.20	650.00	\$780.00
01/16/2018	TCF	LN	Correspond with A. Friedman regarding 544 motion for summary judgment.	0.10	650.00	\$65.00
01/16/2018	TCF	LN	Review and analysis regarding 544 motion for summary judgment.	0.20	650.00	\$130.00
01/17/2018	WNL	LN	Review proposed discovery issues and consider possible discovery requests.	1.80	850.00	\$1,530.00
01/17/2018	WNL	LN	Review additional correspondence regarding check register.	0.10	850.00	\$85.00
01/17/2018	WNL	LN	Confer with A. Friedman regarding discovery and litigation issues.	0.40	850.00	\$340.00
01/17/2018	WNL	LN	Review report of preliminary hearing and scheduling order.	0.10	850.00	\$85.00
01/17/2018	WNL	LN	Confer with A. Friedman regarding discovery and related issues.	0.30	850.00	\$255.00
01/17/2018	WNL	LN	Confer with A. Friedman, J. Bral and S. O'Keefe (telephonically) regarding discovery and related issues.	1.50	850.00	\$1,275.00
01/18/2018	WNL	LN	Confer with A. Friedman regarding various pending issues.	0.30	850.00	\$255.00
01/19/2018	WNL	LN	Review correspondence regarding representation in arbitrations.	0.10	850.00	\$85.00
01/19/2018	WNL	LN	Review B. Beitler objections to request for production.	0.20	850.00	\$170.00
01/21/2018	WNL	LN	Review stipulation vacating response deadline and scheduling status conference.	0.10	850.00	\$85.00
01/22/2018	WNL	LN	Review and analyze motion to strike discovery.	0.90	850.00	\$765.00
01/22/2018	WNL	LN	Review correspondence regarding withdrawal of state court counsel.	0.10	850.00	\$85.00
01/22/2018	WNL	LN	Analyze issues regarding discovery in connection with arbitration.	0.40	850.00	\$340.00
01/22/2018	WNL	LN	Confer with A. Friedman regarding strategy concerning discovery and arbitrations.	0.50	850.00	\$425.00
01/22/2018	WNL	LN	Review correspondence regarding response to	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			discovery request and motion to strike Beitler's discovery in arbitration.			
01/22/2018	WNL	LN	Review and analyze draft joint statement regarding motion to strike Beitler discovery and related correspondence.	0.20	850.00	\$170.00
01/22/2018	WNL	LN	Confer with A. Friedman regarding arbitration issues.	0.30	850.00	\$255.00
01/23/2018	WNL	LN	Analyze issues and potential responses regarding motion to strike discovery.	1.20	850.00	\$1,020.00
01/23/2018	WNL	LN	Confer with A. Friedman regarding arbitration issues.	0.40	850.00	\$340.00
01/23/2018	WNL	LN	Analyze global issues regarding resolution of Beitler litigation and related issues.	1.30	850.00	\$1,105.00
01/23/2018	WNL	LN	Review correspondence regarding readiness conference in Westcliff arbitration.	0.10	850.00	\$85.00
01/23/2018	WNL	LN	Review and analyze changes to language of dispute form.	0.20	850.00	\$170.00
01/23/2018	WNL	LN	Review and analyze issues concerning appellate court issues and consider action to be taken.	0.40	850.00	\$340.00
01/24/2018	WNL	LN	Review correspondence regarding litigation issues.	0.20	850.00	\$170.00
01/24/2018	WNL	LN	Participate in conference call regarding discovery issues and action to be taken.	1.50	850.00	\$1,275.00
01/24/2018	WNL	LN	Conference with A. Friedman regarding litigation strategy and issues.	0.40	850.00	\$340.00
01/24/2018	WNL	LN	Confer with A. Friedman regarding arbitration strategies.	0.40	850.00	\$340.00
01/24/2018	WNL	LN	Review and analyze Westcliff and Mission equity accounts.	0.10	850.00	\$85.00
01/24/2018	WNL	LN	Review correspondence regarding arbitration.	0.20	850.00	\$170.00
01/25/2018	WNL	LN	Review case management statement in Canuae litigation.	0.10	850.00	\$85.00
01/25/2018	WNL	LN	Review orders continuing various hearings.	0.10	850.00	\$85.00
01/25/2018	WNL	LN	Analyze discovery issues and conference with A. Friedman regarding same.	1.30	850.00	\$1,105.00
01/25/2018	WNL	LN	Review correspondence regarding Westcliff equity contributions.	0.10	850.00	\$85.00
01/25/2018	WNL	LN	Review correspondence regarding document production.	0.10	850.00	\$85.00
01/25/2018	WNL	LN	Review correspondence regarding discovery propounded against B. Sargent.	0.10	850.00	\$85.00
01/25/2018	WNL	LN	Review and analyze objections to discovery propounded on Levy Small and Lallas and Beitler.	0.40	850.00	\$340.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/25/2018	WNL	LN	Review additional correspondence regarding discovery to be propounded against B. Sargent.	0.10	850.00	\$85.00
01/25/2018	WNL	LN	Review correspondence regarding timing of discovery responses.	0.10	850.00	\$85.00
01/25/2018	WNL	LN	Review correspondence regarding litigation issues.	0.10	850.00	\$85.00
01/25/2018	WNL	LN	Review correspondence regarding equity contributions action to various partnerships.	0.20	850.00	\$170.00
01/26/2018	WNL	LN	Review joint statement regarding Beitler motion to strike discovery.	0.20	850.00	\$170.00
01/26/2018	WNL	LN	Review correspondence and analyze issues regarding additional discovery and potential objections.	1.40	850.00	\$1,190.00
01/26/2018	WNL	LN	Review correspondence regarding discovery issues in Westcliff arbitration.	0.10	850.00	\$85.00
01/29/2018	WNL	LN	Analyze global discovery and litigation issues.	0.60	850.00	\$510.00
01/29/2018	WNL	LN	Confer with A. Friedman regarding discovery and arbitration issues.	0.40	850.00	\$340.00
01/29/2018	WNL	LN	Review additional documents to be produced.	0.30	850.00	\$255.00
01/29/2018	WNL	LN	Review and analyze documents to be produced.	1.10	850.00	\$935.00
01/29/2018	WNL	LN	Review correspondence regarding documents to be produced.	0.10	850.00	\$85.00
01/29/2018	WNL	LN	Review additional documents to be propounded.	0.50	850.00	\$425.00
01/29/2018	WNL	LN	Confer with A. Friedman regarding overall strategy and action to be taken.	0.30	850.00	\$255.00
01/29/2018	WNL	LN	Review and analyze S. O'Keefe's comments to draft letter to Judge West.	0.20	850.00	\$170.00
01/29/2018	WNL	LN	Review correspondence regarding production of documents.	0.20	850.00	\$170.00
01/29/2018	WNL	LN	Review correspondence regarding responses to requests for production.	0.10	850.00	\$85.00
01/29/2018	WNL	LN	Confer with A. Friedman regarding latest T. Lallas letter brief.	0.10	850.00	\$85.00
01/29/2018	WNL	LN	Second conference with A. Friedman regarding response to T. Lallas letter to Judge West.	0.10	850.00	\$85.00
01/29/2018	WNL	LN	Review and revise letter to Judge West.	0.20	850.00	\$170.00
01/30/2018	WNL	LN	Review opposition of Levene Neale firm to request for production of documents.	0.30	850.00	\$255.00
01/30/2018	WNL	LN	Review additional documents produced by J. Bral in Westcliff Arbitration.	0.20	850.00	\$170.00
01/30/2018	WNL	LN	Review correspondence regarding draft joint statement regarding discovery disputes.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/30/2018	WNL	LN	Conference with A. Friedman regarding discovery issues.	0.20	850.00	\$170.00
01/30/2018	WNL	LN	Review additional documents to be produced by J. Bral.	0.10	850.00	\$85.00
01/31/2018	WNL	LN	Review joint statement regarding discovery requests.	0.30	850.00	\$255.00
01/31/2018	WNL	LN	Analyze courses of action regarding arbitration.	0.40	850.00	\$340.00
01/31/2018	WNL	LN	Analyze pending issues regarding production of documents and objections to production.	0.40	850.00	\$340.00
01/31/2018	TCF	LN	Review and analysis of 544 motion for summary judgment response; research and correspondence regarding same.	0.50	650.00	\$325.00
				49.40		\$41,262.50

Plan & Disclosure Stmt. [B320]

01/04/2018	WNL	PD	Office conference with A. Friedman re: exclusivity and timing issues.	0.20	850.00	\$170.00
01/09/2018	WNL	PD	Confer with A. Friedman regarding restructuring options.	1.00	850.00	\$850.00
				1.20		\$1,020.00

Stay Litigation [B140]

01/12/2018	WNL	SL	Review correspondence regarding stipulation to modify stay regarding arbitrations.	0.10	850.00	\$85.00
01/12/2018	WNL	SL	Review and analysis of stipulation regarding relief from stay and related correspondence.	0.20	850.00	\$170.00
01/12/2018	WNL	SL	Draft comments to draft stipulation for relief from stay.	0.10	850.00	\$85.00
01/13/2018	WNL	SL	Telephone conference with A. Friedman regarding response to draft of stipulation for relief from stay.	0.10	850.00	\$85.00
01/17/2018	WNL	SL	Review additional correspondence regarding stipulation regarding relief from stay.	0.10	850.00	\$85.00
01/18/2018	WNL	SL	Analyze issues regarding stay relief concerning pending appeal.	0.30	850.00	\$255.00
01/18/2018	WNL	SL	Confer with A. Friedman regarding stay relief and appellate issues.	0.50	850.00	\$425.00
01/18/2018	WNL	SL	Review correspondence regarding relief from stay issues and alternatives.	0.30	850.00	\$255.00
01/18/2018	WNL	SL	Review motion for relief from stay and supporting declarations.	0.60	850.00	\$510.00
01/18/2018	WNL	SL	Review correspondence and draft correspondence in response to proposed stipulation.	0.40	850.00	\$340.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/19/2018	NPL	SL	Review motion for relief from stay to proceed with appeal filed by J. Bral; attention to dates and deadlines regarding same.	0.10	375.00	\$37.50
01/19/2018	WNL	SL	Review and comment on draft e-mail to G. Klausner regarding scope of relief from stay in pending arbitrations.	0.20	850.00	\$170.00
01/19/2018	WNL	SL	Review, revise and send e-mail regarding stipulation to modify stay regarding pending arbitrations	0.10	850.00	\$85.00
01/19/2018	WNL	SL	Review additional correspondence regarding stipulation to modify stay in Westcliff matter.	0.10	850.00	\$85.00
01/19/2018	WNL	SL	Review comments on correspondence to G. Klausner regarding stipulation to modify stay.	0.10	850.00	\$85.00
01/19/2018	WNL	SL	Review motion for relief from stay and supporting memorandum.	0.30	850.00	\$255.00
01/23/2018	WNL	SL	Review correspondence regarding modification of stay by state court.	0.10	850.00	\$85.00
01/24/2018	WNL	SL	Review order lifting stay and confer with A. Friedman regarding response to same.	0.40	850.00	\$340.00
01/25/2018	WNL	SL	Review and analyze Beitler's response to motion to modify stay.	0.20	850.00	\$170.00
01/29/2018	WNL	SL	Review correspondence regarding violation of stay in prosecuting appeal.	0.10	850.00	\$85.00
01/31/2018	WNL	SL	Review reply to Beitler's response to motion for relief to allow appeal to proceed.	0.10	850.00	\$85.00
				4.50	\$3,777.50	
TOTAL SERVICES FOR THIS MATTER:						\$64,977.50

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Expenses

01/31/2018	PAC	Pacer - Court Research	1.40
Total Expenses for this Matter			\$1.40

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REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For current services rendered through 01/31/2018

Total Fees	\$64,977.50
Chargeable costs and disbursements	\$1.40
Total Due on Current Invoice.....	\$64,978.90

Outstanding Balance from prior Invoices as of 01/31/2018 **(May not reflect recent payments)**

Invoice Number	Invoice Date	Fees Billed	Expenses Billed	Balance Due
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Total Amount Due on Current and Prior Invoices	\$64,978.90
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Pachulski Stang Ziehl & Jones LLP

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

February 28, 2018
Invoice 118768
Client 10601
Matter 00001
WNL

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 02/28/2018

FEES	\$89,105.00
EXPENSES	\$6,717.72
TOTAL CURRENT CHARGES	\$95,822.72
BALANCE FORWARD	\$64,978.90
TOTAL BALANCE DUE	\$160,801.62

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	11.30	\$9,557.50
ADA	Adversary Actions	1.10	\$412.50
BL	Bankruptcy Litigation [L430]	3.80	\$3,210.00
BO	Business Operations	0.10	\$85.00
CA	Case Administration [B110]	3.90	\$2,515.00
CO	Claims Admin/Objections[B310]	22.80	\$16,665.00
FE	Fee/Employment Application	1.90	\$1,092.50
LN	Litigation (Non-Bankruptcy)	25.00	\$20,920.00
PD	Plan & Disclosure Stmt. [B320]	0.20	\$170.00
RFS	Relief from Stay	8.30	\$3,112.50
SL	Stay Litigation [B140]	36.90	\$31,365.00
		115.30	\$89,105.00

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
HDH	Hochman, Harry D.	Counsel	850.00	28.60	\$24,310.00
NPL	Lockwood, Nancy P. F.	Paralegal	375.00	12.80	\$4,800.00
TCF	Flanagan, Tavi C.	Counsel	650.00	14.10	\$9,165.00
WNL	Lobel, William N.	Partner	850.00	59.80	\$50,830.00
				115.30	\$89,105.00

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Working Meals [E111]	\$30.80
Lexis/Nexis- Legal Research [E	\$82.52

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Outside Services	\$6,525.00
Pacer - Court Research	\$10.20
Reproduction/ Scan Copy	\$2.00
Transcript [E116]	\$67.20
	<hr/> <hr/> \$6,717.72

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
02/01/2018	WNL	AA	Confer with A. Friedman regarding perfection of a charging order and further research and analysis needed.	0.20	850.00	\$170.00
02/01/2018	WNL	AA	Confer with A. Friedman regarding legal arguments and precedent concerning perfection of lien based on charging lien notice with no hearing.	0.40	850.00	\$340.00
02/01/2018	WNL	AA	Confer with A. Friedman regarding issues concerning perfection of charging lien.	0.40	850.00	\$340.00
02/01/2018	WNL	AA	Review correspondence regarding service of subpoena on R. Sargent.	0.10	850.00	\$85.00
02/03/2018	WNL	AA	Review correspondence and analysis of issues concerning perfection of attachment lien.	0.20	850.00	\$170.00
02/03/2018	WNL	AA	Review correspondence re: Motion for Summary Judgment re: avoidance of attachment liens.	0.20	850.00	\$170.00
02/03/2018	WNL	AA	Review and analyze proposed language to be added to Reply re> Motion for Summary Judgment.	0.20	850.00	\$170.00
02/03/2018	WNL	AA	Review relevant cases involving perfection of attachment liens.	0.70	850.00	\$595.00
02/03/2018	WNL	AA	Analyze Hilde decision re: perfection of attachment lien.	0.80	850.00	\$680.00
02/03/2018	WNL	AA	Review and analyze additional cases relevant to perfection of attachment liens.	0.10	850.00	\$85.00
02/03/2018	WNL	AA	Review revisions to Opposition re: Motion for Summary judgment.	0.20	850.00	\$170.00
02/05/2018	WNL	AA	Review correspondence regarding arguments to avoid charging liens.	0.10	850.00	\$85.00
02/05/2018	WNL	AA	Review and analyze results of research regarding perfection of charging lien.	0.20	850.00	\$170.00
02/05/2018	WNL	AA	Confer with A. Friedman regarding legal issues concerning avoidance of charging liens.	0.40	850.00	\$340.00
02/06/2018	WNL	AA	Analyze issues and relevant case law re: Summary Judgment issues and potential defenses.	1.40	850.00	\$1,190.00
02/06/2018	WNL	AA	Review additional revisions to Reply re: avoidance actions.	0.20	850.00	\$170.00
02/07/2018	WNL	AA	Review, analyze and comment on draft or reply regarding motion to expunge charging liens.	0.80	850.00	\$680.00
02/07/2018	WNL	AA	Conferences with A. Friedman regarding reply concerning motion to expunge charging liens.	0.70	850.00	\$595.00
02/07/2018	WNL	AA	Review and analyze relevant cases concerning perfection of a charging lien.	0.80	850.00	\$680.00
02/07/2018	WNL	AA	Review and analyze draft Reply to opposition to	0.70	850.00	\$595.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			debtor's Motion for Summary Judgment on Complaint for Avoidance of Liens.			
02/07/2018	WNL	AA	Review and analyze revisions to Reply to Beitler Opposition to Motion for Summary Judgment re: avoidance of liens.	0.60	850.00	\$510.00
02/07/2018	WNL	AA	Review and analyze further revised Reply re Motion for Summary Judgment.	0.30	850.00	\$255.00
02/07/2018	WNL	AA	Review and analyze further revised Reply in lien avoidance actions.	0.20	850.00	\$170.00
02/08/2018	WNL	AA	Confer with A. Friedman regarding issues concerning enforceability of charging liens.	0.30	850.00	\$255.00
02/08/2018	WNL	AA	Review correspondence re: use of secondary cites in Reply re: avoidance actions.	0.10	850.00	\$85.00
02/15/2018	WNL	AA	Review and analysis of pleadings regarding motion to avoid charging liens.	0.80	850.00	\$680.00
02/20/2018	NPL	AA	Review tentative ruling regarding motion for summary judgment; confer with W. Lobel regarding same.	0.10	375.00	\$37.50
02/21/2018	WNL	AA	Review correspondence re: hearing on Motion for Summary Judgment.	0.10	850.00	\$85.00
				11.30		\$9,557.50

Adversary Actions

02/07/2018	NPL	ADA	Review and reply to email from L. Gauthier regarding joint status reports for three Beitler v. Bral adversary complaints and confer with W. Lobel regarding same; review joint status reports regarding same.	0.60	375.00	\$225.00
02/07/2018	NPL	ADA	Confer with L. Gauthier regarding reply to Beitler's opposition to motion for summary judgment regarding first amended complaint; review same.	0.30	375.00	\$112.50
02/23/2018	NPL	ADA	Review notices of continued status conferences in the three Beitler adversary matters and to dates and deadlines regarding same.	0.20	375.00	\$75.00
				1.10		\$412.50

Bankruptcy Litigation [L430]

02/05/2018	WNL	BL	Review additional production made by J. Bral.	0.20	850.00	\$170.00
02/07/2018	WNL	BL	Review draft Joint Status Reports prepared by Beitler and related correspondence.	0.20	850.00	\$170.00
02/08/2018	WNL	BL	Review evidence re: contributions to Westcliff.	0.10	850.00	\$85.00
02/08/2018	WNL	BL	Review correspondence re: Beiler failure to produce documents in response to discovery demands.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/13/2018	WNL	BL	Review meet and confer request concerning latest discover request.	0.10	850.00	\$85.00
02/13/2018	WNL	BL	Review correspondence regarding motion to compel discovery.	0.10	850.00	\$85.00
02/13/2018	WNL	BL	Confer with A. Friedman regarding discovery issues.	0.20	850.00	\$170.00
02/15/2018	WNL	BL	Review and analyze supplemental status report.	0.20	850.00	\$170.00
02/15/2018	WNL	BL	Confer with A. Friedman re: discovery issues and strategy.	0.40	850.00	\$340.00
02/21/2018	WNL	BL	Attendance at hearings on various matters	1.80	850.00	\$1,530.00
02/22/2018	TCF	BL	Correspond with L. Gauthier regarding hearing on motion for summary judgment on lien avoidance adversary.	0.10	650.00	\$65.00
02/27/2018	WNL	BL	Review correspondence re: pending discovery issues and timing consequences.	0.30	850.00	\$255.00
				3.80	\$3,210.00	

Business Operations

02/20/2018	WNL	BO	Review correspondence re: lack of distributions from Mission and Westcliff.	0.10	850.00	\$85.00
				0.10	\$85.00	

Case Administration [B110]

02/05/2018	NPL	CA	Review critical dates and deadlines and updating same.	0.20	375.00	\$75.00
02/05/2018	WNL	CA	Review and analyze analysis of arguments supporting revocation of the charging liens.	0.20	850.00	\$170.00
02/05/2018	WNL	CA	Review comments regarding argument in favor of revoke charging liens.	0.10	850.00	\$85.00
02/07/2018	NPL	CA	Attention to multiple dates and deadlines regarding Bral v. Westcliff arbitration; confer with W. Lobel regarding same.	0.20	375.00	\$75.00
02/07/2018	NPL	CA	Review and reply to email from L. Gauthier regarding chapter 11 status report; review same.	0.20	375.00	\$75.00
02/09/2018	WNL	CA	Review updated critical dates summary.	0.10	850.00	\$85.00
02/09/2018	NPL	CA	Review critical date memorandum; attention to dates and deadlines regarding same.	0.20	375.00	\$75.00
02/14/2018	WNL	CA	Review and analyze initial draft of Supplemental Status Report.	0.20	850.00	\$170.00
02/15/2018	WNL	CA	Review monthly operating report for January, 2017.	0.10	850.00	\$85.00
02/15/2018	WNL	CA	Review and analyze monthly operating report for January.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/15/2018	WNL	CA	Review revised version of Supplemental Status report.	0.20	850.00	\$170.00
02/20/2018	WNL	CA	Review Supplemental Chapter 11 Status Conference Report and related correspondence.	0.20	850.00	\$170.00
02/21/2018	WNL	CA	Prepare for hearings on status conferences and possible argument on motion to strike	0.70	850.00	\$595.00
02/22/2018	NPL	CA	Review email from L. Gauthier regarding critical date and deadline memorandum and dates and deadlines regarding same.	0.60	375.00	\$225.00
02/22/2018	WNL	CA	Review updated critical dates summary.	0.10	850.00	\$85.00
02/22/2018	WNL	CA	Review status report and continuance of status conference.	0.10	850.00	\$85.00
02/22/2018	TCF	CA	Review and analysis of critical date memo and upcoming issues to be addressed.	0.20	650.00	\$130.00
02/23/2018	NPL	CA	Review notice of continued chapter 11 status conference and attention to dates and deadlines regarding same.	0.20	375.00	\$75.00
				3.90		\$2,515.00

Claims Admin/Objections[B310]

02/01/2018	WNL	CO	Review correspondence re: objection to claim of Bobby Samini.	0.10	850.00	\$85.00
02/07/2018	WNL	CO	Review tentative rulings re: objection to claim of Bobby Samini.	0.20	850.00	\$170.00
02/08/2018	WNL	CO	Confer with A. Friedman and review order regarding denial of Samini claim.	0.10	850.00	\$85.00
02/12/2018	WNL	CO	Review order sustaining objection to claim of B. Samini.	0.10	850.00	\$85.00
02/13/2018	WNL	CO	Analyze issues and develop strategy re: timing issues concerning claims objections and pending arbitrations.	0.60	850.00	\$510.00
02/19/2018	WNL	CO	Review pleadings involving AFG and Beitler improper actions in connection therewith.	0.40	850.00	\$340.00
02/19/2018	WNL	CO	Review issues and relevant pleadings re: claims objections and related issues.	1.80	850.00	\$1,530.00
02/20/2018	WNL	CO	Review and analyze legal issues re: objections to claims.	0.60	850.00	\$510.00
02/22/2018	WNL	CO	Review order continuing hearing on claims objections.	0.10	850.00	\$85.00
02/22/2018	TCF	CO	Review and analysis of outstanding claims, objections and related litigation matters.	0.30	650.00	\$195.00
02/23/2018	WNL	CO	Review and analyze applicability of Halvorson	0.40	850.00	\$340.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			decision in regard to claims objections.			
02/23/2018	WNL	CO	Review and analyze transcript of hearing held on February 21, 2018.	0.70	850.00	\$595.00
02/23/2018	WNL	CO	Review correspondence re: relevance of Halvorson decision.	0.10	850.00	\$85.00
02/23/2018	WNL	CO	Review draft scheduling order re: Motion Seeking Disallowance of Claims 14 and16.	0.10	850.00	\$85.00
02/23/2018	WNL	CO	Review Joint Discovery Stipulation Regarding Discovery Propounded in connection with Motion Seeking Disallowance of Claims.	0.90	850.00	\$765.00
02/23/2018	TCF	CO	Correspondence regarding transcript of hearing regarding motion to strike claims.	0.10	650.00	\$65.00
02/26/2018	WNL	CO	Confer with A. Friedman re: strategy concerning objections to claims	0.20	850.00	\$170.00
02/26/2018	WNL	CO	Review draft scheduling stipulation.	0.10	850.00	\$85.00
02/26/2018	WNL	CO	Review correspondence re: draft Scheduling Order.	0.10	850.00	\$85.00
02/26/2018	WNL	CO	Review additional correspondence re: Scheduling Order.	0.10	850.00	\$85.00
02/26/2018	WNL	CO	Review Beitler's comments to Joint Scheduling Order.	0.10	850.00	\$85.00
02/26/2018	WNL	CO	Review additional correspondence re: Beitler comments to draft Scheduling Order.	0.10	850.00	\$85.00
02/26/2018	WNL	CO	Analyze potential defenses to claims objections.	0.70	850.00	\$595.00
02/26/2018	TCF	CO	Various communications regarding motion to strike proofs of claim and related non-dischargeability actions and additional matters to be addressed in connection with evidentiary hearing thereon.	0.30	650.00	\$195.00
02/26/2018	TCF	CO	Review and analysis of issues related to motion to strike proofs of claim and related non-dischargeability actions and additional matters to be addressed.	1.20	650.00	\$780.00
02/27/2018	WNL	CO	Review correspondence re: discovery issues	0.20	850.00	\$170.00
02/27/2018	WNL	CO	Review correspondence re: amendment of Motion to Strike Claims.	0.10	850.00	\$85.00
02/27/2018	WNL	CO	Review correspondence re: comments on additional arguments to be added to Motion to Strike.	0.10	850.00	\$85.00
02/27/2018	WNL	CO	Review additional correspondence re: amendment of Motion to Strike Claims.	0.10	850.00	\$85.00
02/27/2018	TCF	CO	Review and analysis of scheduling order regarding motion to strike Beitler proofs of claim.	0.10	650.00	\$65.00
02/27/2018	TCF	CO	Various communications with team regarding motion to strike proofs of claim and related non-dischargeability actions and additional matters	0.30	650.00	\$195.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			to be addressed in connection with evidentiary hearing thereon.			
02/27/2018	TCF	CO	Review and analysis of issues and legal research in connection with motion to strike proofs of claim and related non-dischargeability actions and supplemental briefing in connection therewith.	5.40	650.00	\$3,510.00
02/27/2018	TCF	CO	Telephone conference with A. Friedman regarding supplemental briefing on motion to strike claims.	0.20	650.00	\$130.00
02/27/2018	TCF	CO	Correspondence with L. Gauthier regarding motion to strike claims.	0.10	650.00	\$65.00
02/28/2018	NPL	CO	Review scheduling order regarding scheduling order regarding claim objections; attention to dates and deadlines regarding same.	0.20	375.00	\$75.00
02/28/2018	WNL	CO	Confer with A. Friedman re: amended motions to strike	0.20	850.00	\$170.00
02/28/2018	WNL	CO	Review correspondence re: basis for amended motions to strike claims.	0.10	850.00	\$85.00
02/28/2018	WNL	CO	Conferences with A. Friedman re: pending issues, action to be taken and strategy.	0.90	850.00	\$765.00
02/28/2018	WNL	CO	Review correspondence re: strategy in dealing with non-responses to our discovery.	0.20	850.00	\$170.00
02/28/2018	TCF	CO	Commence drafting supplemental brief in connection with motion to strike Beitler Parties' claims and non-dischargeability actions; review and analysis of pleadings and documents in connection therewith.	4.80	650.00	\$3,120.00
02/28/2018	TCF	CO	Various communications regarding motion to strike proofs of claim and related non-dischargeability actions and additional matters to be addressed in connection with evidentiary hearing thereon.	0.30	650.00	\$195.00
				22.80		\$16,665.00

Fee/Employment Application

02/20/2018	NPL	FE	Review Debtor docket regarding objections to Pachulski Stang Ziehl & Jones employment application and prepare declaration that no party requested a hearing regarding same.	0.30	375.00	\$112.50
02/20/2018	NPL	FE	Prepare order approving Pachulski Stang Ziehl & Jones employment application and forward same to W. Lobel for review.	0.30	375.00	\$112.50
02/21/2018	NPL	FE	Finalize declaration that no party requested a hearing regarding Pachulski Stang Ziehl & Jones employment application and finalize order regarding same and confer with W. Lobel regarding same.	0.50	375.00	\$187.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/21/2018	WNL	FE	Review and revise January pre-bill	0.80	850.00	\$680.00
				1.90		\$1,092.50

Litigation (Non-Bankruptcy)

02/02/2018	WNL	LN	Review B. Beitler's responses to discovery propounded on him.	0.90	850.00	\$765.00
02/02/2018	WNL	LN	Review Report on Status of Bankruptcy Stay.	0.10	850.00	\$85.00
02/02/2018	WNL	LN	Review pleadings and correspondence re: withdrawal of Bobby Samini as counsel in state court litigation.	0.10	850.00	\$85.00
02/06/2018	NPL	LN	Review Beitler v. Bral notice regarding denying motion regarding related cases.	0.10	375.00	\$37.50
02/07/2018	WNL	LN	Review Court orders and correspondence related to withdrawal of Bobby Samini as counsel.	0.20	850.00	\$170.00
02/08/2018	NPL	LN	Review notice of change of hearing date regarding Samini's motion to withdraw as counsel.	0.10	375.00	\$37.50
02/08/2018	NPL	LN	Review notice of continued bankruptcy status hearing; attention to dates and deadlines regarding same.	0.20	375.00	\$75.00
02/08/2018	WNL	LN	Review correspondence regarding responses to discovery requests.	0.20	850.00	\$170.00
02/08/2018	WNL	LN	Review documents produced re: capital contributions.	0.40	850.00	\$340.00
02/08/2018	WNL	LN	Review summary of draws taken by members of various entities.	0.10	850.00	\$85.00
02/08/2018	WNL	LN	Review general ledger of Westcliff.	0.20	850.00	\$170.00
02/08/2018	WNL	LN	Review additional correspondence re: responses to discovery requests.	0.10	850.00	\$85.00
02/08/2018	WNL	LN	Review joint status reports in various pending litigation.	0.10	850.00	\$85.00
02/08/2018	WNL	LN	Review correspondence re: failure to respond to pending discovery requests.	0.10	850.00	\$85.00
02/08/2018	WNL	LN	Review correspondence re: tasks in connection with pending appeal.	0.10	850.00	\$85.00
02/09/2018	WNL	LN	Confer with A. Friedman, B. Gaschen and S. O'keefe regarding discovery issues and responses to discovery requests.	1.10	850.00	\$935.00
02/09/2018	WNL	LN	Review correspondence regarding responses to discovery requests.	0.10	850.00	\$85.00
02/09/2018	WNL	LN	Review correspondence regarding mission arbitration.	0.10	850.00	\$85.00
02/09/2018	WNL	LN	Review relevant pleadings in pending appeal.	0.30	850.00	\$255.00

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02/09/2018	WNL	LN	Analyze discovery issues and develop strategy re: non-bankruptcy litigation.	1.80	850.00	\$1,530.00
02/11/2018	TCF	LN	Review and analysis of appeal issues.	0.10	650.00	\$65.00
02/12/2018	WNL	LN	Review correspondence and analyze issues re: pending discovery concerning arbitrations.	1.30	850.00	\$1,105.00
02/12/2018	TCF	LN	Review and analysis of appeal issues and correspondence regarding same.	0.10	650.00	\$65.00
02/12/2018	TCF	LN	Review and analysis of correspondence regarding Westcliff arbitration.	0.10	650.00	\$65.00
02/13/2018	WNL	LN	Review correspondence re: discovery disputes and related issues.	0.20	850.00	\$170.00
02/14/2018	WNL	LN	Review court order regarding Beitler objection to discovery requests and correspondence regarding same.	0.20	850.00	\$170.00
02/14/2018	WNL	LN	Confer with A. Friedman regarding discovery and related issues.	0.30	850.00	\$255.00
02/14/2018	WNL	LN	Review and analyze correspondence regarding discovery issues and strategy.	0.20	850.00	\$170.00
02/14/2018	WNL	LN	Review correspondence regarding continuance of appeal as a violation of stay.	0.10	850.00	\$85.00
02/14/2018	WNL	LN	Review additional correspondence regarding discovery issues.	0.10	850.00	\$85.00
02/14/2018	WNL	LN	Review correspondence regarding meet and confer concerning discovery disputes.	0.10	850.00	\$85.00
02/14/2018	WNL	LN	Review correspondence regarding discovery issues.	0.20	850.00	\$170.00
02/14/2018	WNL	LN	Review correspondence re: discovery issues.	0.20	850.00	\$170.00
02/14/2018	WNL	LN	Conferences with A. Friedman re: discovery issues.	0.30	850.00	\$255.00
02/14/2018	WNL	LN	Review and analyze applicable law concerning scope of arbitrations.	0.60	850.00	\$510.00
02/15/2018	WNL	LN	Review correspondence regarding dismissal of appeal from award of attorneys' fee.	0.10	850.00	\$85.00
02/15/2018	WNL	LN	Additional conference with A. Friedman regarding discovery, scope of relief from stay and strategy issues.	0.50	850.00	\$425.00
02/15/2018	WNL	LN	Review correspondence regarding further production of documents in response to discovery requests.	0.20	850.00	\$170.00
02/15/2018	WNL	LN	Review correspondence regarding discovery issues.	0.20	850.00	\$170.00
02/15/2018	WNL	LN	Review correspondence regarding arbitration issues.	0.10	850.00	\$85.00
02/15/2018	WNL	LN	Review discovery directed to R. Sargent.	0.10	850.00	\$85.00
02/15/2018	TCF	LN	Review and analysis of appeal issues and correspondence with respect thereto.	0.10	650.00	\$65.00

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02/16/2018	WNL	LN	Confer with A. friedman re: strategy and legal issues concerning motion to avoid charging liens.	0.40	850.00	\$340.00
02/16/2018	WNL	LN	Review and analyze Joint Statement Re; Discovery.	0.40	850.00	\$340.00
02/16/2018	WNL	LN	Review additional correspondence re: discovery issues.	0.20	850.00	\$170.00
02/16/2018	WNL	LN	Review correspondence re: responses to requests for admission and special interrogatories.	0.10	850.00	\$85.00
02/16/2018	WNL	LN	Review Barry beitler and Betsy boyd's responses to requests for production.	0.30	850.00	\$255.00
02/16/2018	WNL	LN	Review correspondence re: claim numbers 9 and 14.	0.10	850.00	\$85.00
02/16/2018	WNL	LN	Review privilege log in westcliff arbitration.	0.10	850.00	\$85.00
02/16/2018	WNL	LN	Review correspondence re: res judicata issues.	0.10	850.00	\$85.00
02/16/2018	WNL	LN	Review Beitler responses to discovery requests and related correspondence.	0.20	850.00	\$170.00
02/16/2018	WNL	LN	Review correspondence re: responses to special interrogatories.	0.10	850.00	\$85.00
02/16/2018	WNL	LN	Conferences with A. Friedman re: overall strategy and course of action to pursue.	0.50	850.00	\$425.00
02/20/2018	WNL	LN	Conferences with A. Friedman re: strategy and preparation for pending hearing.	0.40	850.00	\$340.00
02/20/2018	WNL	LN	Telephone conference with A. Friedman and S. O'Keefe re: preparation for hearing on Motion for Summary Judgment	0.70	850.00	\$595.00
02/20/2018	WNL	LN	Review Robert Sargent's objections to documents demanded to be produced at his deposition	0.20	850.00	\$170.00
02/20/2018	WNL	LN	Review summary of documents produced by Bob Sargent.	0.10	850.00	\$85.00
02/20/2018	WNL	LN	Review relevant pleadings and analyze issues concerning discovery disputes.	1.60	850.00	\$1,360.00
02/21/2018	WNL	LN	Conferences with A. Friedman re: pending hearings:	1.50	850.00	\$1,275.00
02/21/2018	WNL	LN	Analyze action to be taken re: discovery disputes and strategy to prepare for April 18 hearing	0.80	850.00	\$680.00
02/21/2018	WNL	LN	Confer with A. Friedman and B. Gaschen re: strategy concerning discovery and action to be taken	0.90	850.00	\$765.00
02/21/2018	WNL	LN	Review correspondence re: basis for waiver of arbitration rights arguments.	0.20	850.00	\$170.00
02/21/2018	WNL	LN	Review and analyze answer and cross complaint filed by Beitler in Mission litigation.	0.40	850.00	\$340.00
02/21/2018	WNL	LN	Review pleadings in Mission state court litigation.	0.20	850.00	\$170.00
02/21/2018	WNL	LN	Review correspondence from AAA re: pending arbitrations.	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/22/2018	WNL	LN	Review correspondence re: Mission and Westcliff arbitrations.	0.20	850.00	\$170.00
02/22/2018	WNL	LN	Review correspondence re: evidence of waiver of the right to arbitrate.	0.20	850.00	\$170.00
02/22/2018	WNL	LN	Review correspondence re: arbitration issues.	0.10	850.00	\$85.00
02/22/2018	WNL	LN	Review list of potential arbiters from AAA.	0.10	850.00	\$85.00
02/22/2018	WNL	LN	Review correspondence re pending arbitrations.	0.10	850.00	\$85.00
02/22/2018	TCF	LN	Review and analysis of lien related issues.	0.20	650.00	\$130.00
02/22/2018	TCF	LN	Correspond with L. Gauthier regarding lien issues.	0.10	650.00	\$65.00
02/26/2018	WNL	LN	Review correspondence from AAA.	0.10	850.00	\$85.00
02/26/2018	WNL	LN	Analyze discovery issues and create strategy to deal with timing issues.	0.80	850.00	\$680.00
02/26/2018	WNL	LN	Analyze timing and related issues.	0.40	850.00	\$340.00
02/28/2018	WNL	LN	Confer with A. Friedman re: discovery issues and strategy re: same	0.20	850.00	\$170.00
02/28/2018	WNL	LN	Review final form of Scheduling order.	0.20	850.00	\$170.00
02/28/2018	WNL	LN	Review correspondence re: arbitration issues.	0.10	850.00	\$85.00
02/28/2018	WNL	LN	Review correspondence re: documents to be produced pursuant to discovery requests.	0.10	850.00	\$85.00
02/28/2018	WNL	LN	Review and analyze documents produced by R. Sargent.	0.30	850.00	\$255.00
02/28/2018	WNL	LN	Review and respond to correspondence re: arbitrator for Mission arbitration.	0.20	850.00	\$170.00
02/28/2018	WNL	LN	Review additional correspondence re: Mission arbitration	0.10	850.00	\$85.00
				25.00		\$20,920.00

Plan & Disclosure Stmt. [B320]

02/14/2018	WNL	PD	Telephone call with T. Flanagan re> Plan and Disclosure Statement preparation.	0.20	850.00	\$170.00
				0.20		\$170.00

Relief from Stay

02/08/2018	NPL	RFS	Review order granting relief from stay in non-bankruptcy action in state court action regarding Beitler v. Bral; review emails regarding same.	0.20	375.00	\$75.00
02/21/2018	NPL	RFS	Confer with A. Friedman regarding responses due to Beitler/Boyd motions for relief from stay.	0.10	375.00	\$37.50
02/22/2018	NPL	RFS	Confer with L. Gauthier and A. Friedman regarding responses to Beitler/Boyd motions for relief from	0.10	375.00	\$37.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			stay.			
02/22/2018	NPL	RFS	Confer with H. Hochman regarding responses to Beitler/Boyd motions for relief from stay; draft email to H. Hochman regarding same.	0.20	375.00	\$75.00
02/22/2018	NPL	RFS	Review memorandum of points and authorities regarding unpublished opinions regarding responses to Beitler/Boyd motions for relief from stay; research Lexis regarding same.	1.60	375.00	\$600.00
02/22/2018	NPL	RFS	Confer with B. Gaschen regarding appendix of unpublished opinions regarding responses to Beitler/Boyd motions for relief from stay.	0.10	375.00	\$37.50
02/22/2018	NPL	RFS	Prepare appendix of unpublished opinions regarding responses to Beitler/Boyd motions for relief from stay; forward same to A. Friedman for review.	0.80	375.00	\$300.00
02/22/2018	NPL	RFS	Revise and finalize response to Beitler/Boyd motions for relief from stay; confer with A. Friedman regarding same; multiple emails with A. Friedman regarding same; confer with B. Gaschen regarding same.	1.80	375.00	\$675.00
02/22/2018	NPL	RFS	Revise and finalize declaration of J. Alpert regarding response to Beitler/Boyd motions for relief from stay; review and compile exhibits regarding same; confer with A. Friedman regarding same; confer with J. Alpert regarding same, multiple emails to J. Alpert regarding same.	1.20	375.00	\$450.00
02/22/2018	NPL	RFS	Revise and finalize declaration of B. Gaschen regarding response to Beitler/Boyd motions for relief from stay; confer with B. Gaschen regarding same.	0.50	375.00	\$187.50
02/22/2018	NPL	RFS	Revise and finalize appendix of unpublished opinions regarding response to Beitler/Boyd motions for relief from stay; confer with B. Gaschen regarding same.	0.80	375.00	\$300.00
02/22/2018	NPL	RFS	Draft email to A. Friedman, H. Hochman, W. Lobel and B. Gaschen regarding response to Beitler/Boyd motions for relief from stay.	0.10	375.00	\$37.50
02/22/2018	NPL	RFS	Review and reply to email from S. O'Keefe regarding response to Beitler/Boyd motions for relief from stay.	0.10	375.00	\$37.50
02/23/2018	NPL	RFS	Confer with J. O'Keefe regarding transcript for hearing on motions for relief from stay; review debtor docket regarding same.	0.20	375.00	\$75.00
02/23/2018	NPL	RFS	Review transcript from hearing on motions for relief from stay.	0.30	375.00	\$112.50
02/23/2018	NPL	RFS	Confer with L. Gauthier regarding opposition to motions for relief from stay.	0.20	375.00	\$75.00

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				8.30	\$3,112.50
Stay Litigation [B140]					
02/07/2018	WNL	SL	Review tentative ruling and related correspondence re:relief from stay to allow appeal to proceed.	0.20	\$170.00
02/08/2018	WNL	SL	Review order modifying stay to allow appeal to proceed.	0.10	\$85.00
02/08/2018	WNL	SL	Review order modifying stay to allow appeal to proceed.	0.10	\$85.00
02/12/2018	WNL	SL	Analyze legal issues concerning scope of relief from stay and responses to various positions being taken by Beitler parties	0.80	\$680.00
02/13/2018	WNL	SL	Analyze issues and alternatives courses of actuin concerning pending arbitartions.	0.80	\$680.00
02/15/2018	WNL	SL	Confer with A. Friedman regarding strategy and issues regarding scope of issues to be decided in arbitrations.	0.40	\$340.00
02/15/2018	WNL	SL	Confer with A. Friedman regarding responses to relief from stay motions filed by Beitler.	0.40	\$340.00
02/15/2018	WNL	SL	Review and analyze motions for relief from stay regarding arbitrations.	0.30	\$255.00
02/15/2018	WNL	SL	Review final version of supplemental status report.	0.30	\$255.00
02/16/2018	HDH	SL	Conference with Ira D. Kharasch re stay motion	0.20	\$170.00
02/16/2018	HDH	SL	Review and analyze motion for Relief from Stay and background documents	2.70	\$2,295.00
02/16/2018	HDH	SL	Conference call with Lobel and Friedman re motion for stay relief	0.50	\$425.00
02/16/2018	WNL	SL	Review additional correspondence re: documents to be reviewed in responding to motions for relief from stay.	0.20	\$170.00
02/16/2018	WNL	SL	Confer with A. friedman re: responses to motions for relief from stay re: arbitration matters.	0.30	\$255.00
02/16/2018	WNL	SL	Review additional correspondence re: responses to motions to stay.	0.10	\$85.00
02/16/2018	WNL	SL	Telephone conference with H.Hochman re: responses to motions for Relief from Stay.	0.20	\$170.00
02/16/2018	WNL	SL	Review correspondence re: documents to be delivered to H. Hochman.	0.10	\$85.00
02/16/2018	WNL	SL	Conferences with A. friedman and B. Gaschen re: discovery issues and course of action to pursue.	0.60	\$510.00
02/19/2018	HDH	SL	Research stay relief issues	2.20	\$1,870.00
02/19/2018	WNL	SL	Review correspondence and pleadings filed by Beitler re: Motion for Relief from Stay.	0.90	\$765.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/20/2018	HDH	SL	Begin drafting opposition to motion for relief from stay motion	5.80	850.00	\$4,930.00
02/21/2018	HDH	SL	Research and drafting of opposition to stay relief motion	9.40	850.00	\$7,990.00
02/21/2018	HDH	SL	Review documents re litigation and stay motion	0.70	850.00	\$595.00
02/22/2018	HDH	SL	Research and drafting of opposition to stay relief motion	5.70	850.00	\$4,845.00
02/22/2018	HDH	SL	Telephone conference with N. Lockwood re opposition	0.20	850.00	\$170.00
02/22/2018	HDH	SL	Correspond with A. Friedman re stay motion opposition	0.30	850.00	\$255.00
02/22/2018	HDH	SL	Review and revise opposition	0.50	850.00	\$425.00
02/22/2018	HDH	SL	Complete and revise draft of opposition	0.40	850.00	\$340.00
02/22/2018	WNL	SL	Review and analyze and comment on draft opposition to Motions for Relief from Stay.	0.80	850.00	\$680.00
02/22/2018	WNL	SL	Review initial draft of Declaration of Jeffrey Alpert in support of Opposition to Motions for Relief from Stay.	0.10	850.00	\$85.00
02/22/2018	WNL	SL	Review correspondence re> draft of Opposition to Motions for Relief from Stay.	0.10	850.00	\$85.00
02/22/2018	WNL	SL	Review revised Opposition to Motions for Relief from Stay.	0.20	850.00	\$170.00
02/22/2018	WNL	SL	Review correspondence re: additional evidence to support Opposition.	0.20	850.00	\$170.00
02/22/2018	WNL	SL	Review correspondence re: Boyd's Petition To Compel Arbitration.	0.10	850.00	\$85.00
02/22/2018	WNL	SL	Review draft of Declaration of Beth Gaschen.	0.10	850.00	\$85.00
02/27/2018	WNL	SL	Review final version of Opposition to Motions for Stay Relief.	0.60	850.00	\$510.00
02/27/2018	WNL	SL	Review Declarations in support of Opposition.	0.30	850.00	\$255.00
				36.90		\$31,365.00

TOTAL SERVICES FOR THIS MATTER: **\$89,105.00**

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Expenses

02/14/2018	OS	American Arbitration Association, Mission Arbitration for John Jean Bral, WNL	4,750.00
02/21/2018	BM	Business Meal [E111] Grubhub, The Main Course, Working Meal, HDH	30.80
02/22/2018	LN	10601.00001 Lexis Charges for 02-22-18	82.52
02/22/2018	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
02/26/2018	TR	Transcript [E116] Briggs Reporting Company, Inc., Inv. 19067, WNL	67.20
02/27/2018	OS	American Arbitration- AAA Additional Party Fees for filing and Proceed in Bral Westcliff Arbitration, WNL	1,275.00
02/27/2018	OS	American Arbitration- AAA Bral's share of the Arbitrator's Compensation Deposit for Preliminary Matters in Bral Arbitration.	500.00
02/28/2018	PAC	Pacer - Court Research	10.20
Total Expenses for this Matter			\$6,717.72

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REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For current services rendered through 02/28/2018

Total Fees	\$89,105.00
Chargeable costs and disbursements	\$6,717.72
Total Due on Current Invoice.....	\$95,822.72

Outstanding Balance from prior Invoices as of 02/28/2018 **(May not reflect recent payments)**

Invoice Number	Invoice Date	Fees Billed	Expenses Billed	Balance Due
118521	01/31/2018	\$64,977.50	\$1.40	\$64,978.90
Total Amount Due on Current and Prior Invoices				\$160,801.62

Pachulski Stang Ziehl & Jones LLP

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

March 31, 2018
Invoice 119267
Client 10601
Matter 00001
WNL

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 03/31/2018

FEES	\$170,795.00
EXPENSES	\$818.42
TOTAL CURRENT CHARGES	\$171,613.42
BALANCE FORWARD	\$160,801.62
TOTAL BALANCE DUE	\$332,415.04

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	0.50	\$425.00
BL	Bankruptcy Litigation [L430]	4.80	\$4,080.00
CA	Case Administration [B110]	3.20	\$1,675.00
CO	Claims Admin/Objections[B310]	114.90	\$85,845.00
LN	Litigation (Non-Bankruptcy)	32.80	\$25,335.00
PD	Plan & Disclosure Stmt. [B320]	3.70	\$2,155.00
SL	Stay Litigation [B140]	72.20	\$51,280.00
		232.10	\$170,795.00

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
HDH	Hochman, Harry D.	Counsel	850.00	2.00	\$1,870.00
NPL	Lockwood, Nancy P. F.	Paralegal	375.00	26.40	\$9,900.00
SAOS	O'Keefe, Sean A	Counsel	750.00	60.80	\$45,600.00
TCF	Flanagan, Tavi C.	Counsel	650.00	40.20	\$26,130.00
WNL	Lobel, William N.	Partner	850.00	102.70	\$87,295.00
				232.10	\$170,795.00

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Outside Services	\$47.33
Pacer - Court Research	\$25.40
Reproduction/ Scan Copy	\$81.60
Overtime	\$89.29

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Travel Expense [E110]	\$14.00
Transcript [E116]	\$560.80
	<hr/> <hr/> \$818.42

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
03/01/2018	WNL	AA	Review Notice of Sale and related correspondence.	0.10	850.00	\$85.00
03/30/2018	WNL	AA	Review and analyze correspondence re: potential value of, and debt against, Mission property and related issues.	0.20	850.00	\$170.00
03/30/2018	WNL	AA	Review correspondence re: information needed to value various pieces of real property.	0.10	850.00	\$85.00
03/30/2018	WNL	AA	Review correspondence regarding engagement of appraisers.	0.10	850.00	\$85.00
				0.50		\$425.00
Bankruptcy Litigation [L430]						
03/07/2018	WNL	BL	Review and analyze final version of Joint Discovery Stipulation.	0.80	850.00	\$680.00
03/08/2018	WNL	BL	Confer with G. Klausner and D. Resnick re: potential global settlement .	0.60	850.00	\$510.00
03/08/2018	WNL	BL	Telephone conference with A. Friedman re: results of hearing and action to be taken.	0.20	850.00	\$170.00
03/22/2018	WNL	BL	Review and analyze Beitler parties draft of Joint Discovery Stipulation.	1.40	850.00	\$1,190.00
03/23/2018	WNL	BL	Request for information re: Westcliff and Mission properties.	0.10	850.00	\$85.00
03/26/2018	WNL	BL	Review final versions of Joint Discovery Stipulations.	0.80	850.00	\$680.00
03/26/2018	WNL	BL	Review correspondence re: service of Joint Discovery Stipulation.	0.10	850.00	\$85.00
03/26/2018	WNL	BL	Review additional correspondence re: Joint Discovery Stipulations.	0.10	850.00	\$85.00
03/27/2018	WNL	BL	Review correspondence re: compliance with discovery requests.	0.10	850.00	\$85.00
03/27/2018	WNL	BL	Review correspondence re: inadvertently included items on privileged document list.	0.10	850.00	\$85.00
03/27/2018	WNL	BL	Review correspondence re: Joint Discovery Stipulation.	0.20	850.00	\$170.00
03/28/2018	WNL	BL	Draft e-mail to J. Bral re: need to respond to request for information re: Mission property.	0.20	850.00	\$170.00
03/29/2018	WNL	BL	Review correspondence re: final versions of Joint Discovery Stipulations.	0.10	850.00	\$85.00
				4.80		\$4,080.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Case Administration [B110]						
03/12/2018	NPL	CA	Attention to multiple outstanding matters; dates and deadlines regarding same.	0.40	375.00	\$150.00
03/15/2018	WNL	CA	Review monthly operating report for February, 2018.	0.10	850.00	\$85.00
03/15/2018	NPL	CA	Review monthly operating report for month ending February 28, 2018.	0.10	375.00	\$37.50
03/16/2018	WNL	CA	Review correspondence regarding pending deadlines.	0.20	850.00	\$170.00
03/16/2018	WNL	CA	Review updated critical dates summary.	0.10	850.00	\$85.00
03/19/2018	NPL	CA	Review and reply to email from L. Gauthier regarding firm name change for main case and adversaries.	0.10	375.00	\$37.50
03/19/2018	NPL	CA	Prepare notices of change of firm for main case and four adversary matters; forward same to W. Lobel for review.	0.70	375.00	\$262.50
03/19/2018	NPL	CA	Finalize firm address changes for main case and four adversary matters.	0.30	375.00	\$112.50
03/19/2018	NPL	CA	Review and reply to email from J. O'Keefe regarding firm address changes.	0.10	375.00	\$37.50
03/26/2018	NPL	CA	Attention to dates and deadlines regarding supplement to motion to strike and special fraud brief.	0.10	375.00	\$37.50
03/27/2018	NPL	CA	Review debtor docket regarding outstanding matters; attention to dates and deadlines regarding same.	0.20	375.00	\$75.00
03/28/2018	WNL	CA	Telephone call with A. Friedman re: action to be taken.	0.30	850.00	\$255.00
03/28/2018	NPL	CA	Review email from L. Gauthier regarding critical dates and deadlines memorandum; review and attention to same.	0.20	375.00	\$75.00
03/28/2018	WNL	CA	Review revised critical date summary.	0.10	850.00	\$85.00
03/29/2018	WNL	CA	Review correspondence re: continued status conference.	0.10	850.00	\$85.00
03/30/2018	WNL	CA	Review updated critical dates sunmmary.	0.10	850.00	\$85.00
				<hr/> 3.20	<hr/> \$1,675.00	

Claims Admin/Objections[B310]

03/01/2018	TCF	CO	Review and analysis of motion to strike and issues related thereto.	0.60	650.00	\$390.00
03/02/2018	WNL	CO	Telephone call with A. Friedman re: Beitler's Reply to motions to strike	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/02/2018	WNL	CO	Review correspondence re: bank resolutions allegedly signed by Joohn Bral and analyze issues raised thereby and relevant arguments.	0.60	850.00	\$510.00
03/02/2018	WNL	CO	Review relevant documents and related correspondence re: Bral and beitler as co-managing partners of Westcliff.	0.40	850.00	\$340.00
03/02/2018	WNL	CO	Review and analyze correspondence re: arguments to be raised at pending hearing.	0.20	850.00	\$170.00
03/05/2018	SAO	CO	Conference call with A. Friedman re joint statement for discovery dispute with Beitler re motion to strike claims.	0.20	750.00	\$150.00
03/05/2018	SAO	CO	Continue preparing special brief on crime fraud exception as applied to motion to strike claims.	1.10	750.00	\$825.00
03/05/2018	SAO	CO	Draft insert to Joint Statement re discovery dispute with Beitler re Motion to Strike Claims.	2.90	750.00	\$2,175.00
03/05/2018	WNL	CO	Review correspondence re: revision of Evidentiary Objections and Motion to Strike.	0.10	850.00	\$85.00
03/05/2018	WNL	CO	Review and analyze correspondence and possible additional discovery to be propounded.	0.20	850.00	\$170.00
03/05/2018	WNL	CO	Review correspondence re: signatures by John Bral on Westcliff bank forms.	0.20	850.00	\$170.00
03/05/2018	WNL	CO	Review final version of Joint Stipulation re: Discovery Disputes.	0.60	850.00	\$510.00
03/06/2018	WNL	CO	Review correspondence re: issues concerning bank documents allegedly signed by John Bral.	0.20	850.00	\$170.00
03/06/2018	WNL	CO	Review and analyze Beitler Opposition to Motion to Strike Lallas Declaration.	0.20	850.00	\$170.00
03/06/2018	WNL	CO	Review bank instruction signed by John Bral and respond to same.	0.10	850.00	\$85.00
03/06/2018	WNL	CO	Telephone call with A. Friedman re: Beitler divorce proceedings.	0.10	850.00	\$85.00
03/06/2018	WNL	CO	Review correspondence re: inquiry	0.10	850.00	\$85.00
03/06/2018	WNL	CO	Correspondence re: forgery issues and action to be taken.	0.10	850.00	\$85.00
03/06/2018	WNL	CO	Review additional correspondence re: bank records.	0.10	850.00	\$85.00
03/06/2018	WNL	CO	Review additional correspondence re: Motion to Strike.	0.10	850.00	\$85.00
03/06/2018	WNL	CO	Review correspondence re: Pacific Western documents.	0.10	850.00	\$85.00
03/06/2018	WNL	CO	Review correspondence re: production of documents by the Beitler parties.	0.10	850.00	\$85.00
03/07/2018	SAO	CO	Continue preparing brief re crime fraud exception to attorney client privilege for presentation at hearing	1.30	750.00	\$975.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			on motion to strike claims.			
03/07/2018	TCF	CO	Correspondence with A. Friedman regarding response amended/supplemental to motion to Strike proofs of claim.	0.10	650.00	\$65.00
03/08/2018	TCF	CO	Research and drafting regarding the doctrine of unclean hands and supplemental to motion to Strike proofs of claims.	5.80	650.00	\$3,770.00
03/09/2018	WNL	CO	Review and analyze issues and arguments re: pending discovery, proposed discovery and related issues.	1.60	850.00	\$1,360.00
03/11/2018	TCF	CO	Drafting of supplemental to motion to Strike proofs of claim.	2.60	650.00	\$1,690.00
03/11/2018	TCF	CO	Research and preparation of supplemental to motion to Strike proofs of claim.	1.20	650.00	\$780.00
03/12/2018	NPL	CO	Review and reply to email from A. Friedman regarding transcript for hearing on motion to strike fraudulent claims review adversary docket regarding same; review debtor docket regarding same; draft email to Briggs Court Reporting regarding same.	0.40	375.00	\$150.00
03/12/2018	NPL	CO	Telephone call with H. Martens regarding transcript on hearing on motion to strike fraudulent claims.	0.10	375.00	\$37.50
03/12/2018	NPL	CO	Draft email to A. Friedman regarding transcript status regarding hearing on motion to strike fraudulent claims.	0.10	375.00	\$37.50
03/12/2018	WNL	CO	Review correspondence re: handwriting expert.	0.10	850.00	\$85.00
03/12/2018	WNL	CO	Review correspondence re: transcripts of hearings.	0.10	850.00	\$85.00
03/12/2018	WNL	CO	Analyze issues and potential action to be taken in connection with objections to claims.	1.40	850.00	\$1,190.00
03/12/2018	WNL	CO	Review and analyze documents produced by Levy, Small and Lallas and consider ramifications of documents produced.	0.80	850.00	\$680.00
03/12/2018	WNL	CO	Review query and response re: Westcliff Operating Agreement.	0.10	850.00	\$85.00
03/12/2018	TCF	CO	Drafting and research regarding supplemental motion to strike proofs of claim, doctrine of unclean hands and remedies.	4.80	650.00	\$3,120.00
03/13/2018	NPL	CO	Review email from L. Gauthier regarding document production from Lallas; draft email to B. Anavam regardng same.	0.10	375.00	\$37.50
03/13/2018	NPL	CO	Review and reply to email from H. Martens regarding transcript for hearing on motion to strike claims as fraudulent.	0.20	375.00	\$75.00
03/13/2018	NPL	CO	Draft email to A. Friedman regarding transcript of hearing on motion to strike claim as fraudulent;	0.30	375.00	\$112.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			review transcript regarding same.			
03/13/2018	SAO	CO	Review supplement to motion to strike prepared by T. Flanagan and begin revisions.	1.00	750.00	\$750.00
03/13/2018	SAO	CO	Revise crime fraud brief re hearing on motion to strike claims.	1.20	750.00	\$900.00
03/13/2018	WNL	CO	Review and analyze documents produced by Levy, Small and Lallas, privilege log and index of documents produced.	0.70	850.00	\$595.00
03/13/2018	WNL	CO	Review correspondence re: documents on Westcliff at Fidelity National Title.	0.10	850.00	\$85.00
03/13/2018	WNL	CO	Telephone conference with A. Friedman re: economics of potential settlement versus continued litigation.	0.50	850.00	\$425.00
03/13/2018	WNL	CO	Review and respond to correspondence re: documents produced by Levy, Small and Lallas.	0.10	850.00	\$85.00
03/13/2018	WNL	CO	Review correspondence re: identity of arbiter for Mission arbitration.	0.10	850.00	\$85.00
03/13/2018	WNL	CO	Analyze legal and factual issues concerning doctrine of unclean hands and objections to claims.	0.90	850.00	\$765.00
03/13/2018	WNL	CO	Review correspondence and analyze issues re: legal theories concerning objections to claims.	0.20	850.00	\$170.00
03/13/2018	WNL	CO	Review correspondence re: documents produced by Levy, Small and Lallas	0.20	850.00	\$170.00
03/13/2018	WNL	CO	Review and analyze documents produced by Betsy Boyd and consider issues raised thereby.	1.50	850.00	\$1,275.00
03/13/2018	WNL	CO	Review additional correspondence regarding Westcliff Operating Agreement.	0.10	850.00	\$85.00
03/13/2018	TCF	CO	Correspondence with A. Friedman regarding claims and case strategy.	0.10	650.00	\$65.00
03/14/2018	WNL	CO	Confer with A. Friedman re: settlement issues and related topics.	0.70	850.00	\$595.00
03/14/2018	WNL	CO	Review and analyze analysis of projected outcome of case.	0.10	850.00	\$85.00
03/14/2018	WNL	CO	Conferences with A. Friedman re: various aspects of case and settlement issues	0.90	850.00	\$765.00
03/14/2018	WNL	CO	Confer with J. Bral, A. Friedman et al re: financial analysis of case and action to be taken re: discovery and timing issues.	2.30	850.00	\$1,955.00
03/14/2018	WNL	CO	Review and analyze Joint Discovery Stipulation Regarding Discovery Propounded to Beitler and Associates.	0.70	850.00	\$595.00
03/14/2018	TCF	CO	Review and analysis of transcript of motion to strike.	0.50	650.00	\$325.00
03/15/2018	SAO	CO	Complete draft of crime fraud brief re motion to	1.90	750.00	\$1,425.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			strike claims.			
03/15/2018	SAO	CO	Draft inserts to supplemental brief re motion to strike claims.	1.30	750.00	\$975.00
03/15/2018	WNL	CO	Review engagement documents regarding hiring handwriting expert.	0.20	850.00	\$170.00
03/15/2018	WNL	CO	Review and analyze draft brief on crime/fraud exception.	0.80	850.00	\$680.00
03/15/2018	WNL	CO	Review correspondence regarding document production issues.	0.20	850.00	\$170.00
03/15/2018	WNL	CO	Review and analyze documents and deposition transcript regarding Westcliff issues.	0.40	850.00	\$340.00
03/15/2018	WNL	CO	Review correspondence regarding Westcliff Issues.	0.10	850.00	\$85.00
03/15/2018	WNL	CO	Review additional correspondence regarding Barry Beitler document production.	0.20	850.00	\$170.00
03/15/2018	WNL	CO	Review revised brief regarding crime fraud exception.	0.60	850.00	\$510.00
03/15/2018	WNL	CO	Review additional correspondence regarding Beitler document production.	0.10	850.00	\$85.00
03/15/2018	WNL	CO	Review correspondence regarding deposition questions by Tom Lallas.	0.20	850.00	\$170.00
03/15/2018	WNL	CO	Review correspondence regarding production of documents by Barry Beitler.	0.10	850.00	\$85.00
03/15/2018	WNL	CO	Analyze relevant documents produced by Barry Beitler.	2.60	850.00	\$2,210.00
03/16/2018	SAO	CO	Review modification to brief re crime fraud exception relating to motion to strike claims.	0.50	750.00	\$375.00
03/16/2018	SAO	CO	Prepare revisions to supplement in support of motion to strike claims.	1.10	750.00	\$825.00
03/16/2018	WNL	CO	Analyze Issues concerning pending legal and factual issues.	1.40	850.00	\$1,190.00
03/19/2018	SAO	CO	Review supplement re motion to strike claims.	1.20	750.00	\$900.00
03/19/2018	WNL	CO	Review and analyze additional production by B. Beitler.	0.60	850.00	\$510.00
03/19/2018	WNL	CO	Review correspondence regarding statements by T. Lallas regarding source of altered documents.	0.20	850.00	\$170.00
03/19/2018	WNL	CO	Review Correspondence regarding engagement of handwriting expect.	0.10	850.00	\$85.00
03/20/2018	SAO	CO	Revise supplement to motion to strike claims.	1.90	750.00	\$1,425.00
03/20/2018	WNL	CO	Review correspondence re: Court ruling on motions for relief from stay.	0.20	850.00	\$170.00
03/20/2018	WNL	CO	Review correspondence on Supplemental Motion to Strike Claims.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/20/2018	WNL	CO	Review correspondence re: proposed new language to add to order on Relief from Stay Motion.	0.10	850.00	\$85.00
03/20/2018	WNL	CO	Review correspondence regarding exemplars of signatures of B. Beitler and J. Bral and analyze signatures.	0.40	850.00	\$340.00
03/20/2018	WNL	CO	Review additional correspondence regarding altered operating agreements.	0.20	850.00	\$170.00
03/20/2018	WNL	CO	Review additional correspondence regarding signatures of J. Bral.	0.10	850.00	\$85.00
03/20/2018	WNL	CO	Analyze overall strategy and relevant legal and factual issues.	1.20	850.00	\$1,020.00
03/20/2018	TCF	CO	Correspondence with A. Friedman regarding motion to strike.	0.10	650.00	\$65.00
03/20/2018	TCF	CO	Review and analysis of issues regarding motion to strike.	0.20	650.00	\$130.00
03/21/2018	SAO	CO	Revise supplemental brief in support of motion to strike claims.	7.80	750.00	\$5,850.00
03/21/2018	SAO	CO	Review hearing transcripts to understand defensive arguments made by Beitler re motion to strike claims.	1.20	750.00	\$900.00
03/21/2018	WNL	CO	Review correspondence re: 2016 deposition of John Bral.	0.10	850.00	\$85.00
03/21/2018	WNL	CO	Review and analyze proposed joint discovery stipulation with revisions by B. Beitler.	1.90	850.00	\$1,615.00
03/21/2018	WNL	CO	Review correspondence regarding subpoenas for hearing on 4/18/18.	0.20	850.00	\$170.00
03/21/2018	WNL	CO	Review correspondence regarding timing issues concerning 4/18/18 hearing.	0.10	850.00	\$85.00
03/22/2018	NPL	CO	Review emails regarding document production; privileged documents; and production regarding same.	0.20	375.00	\$75.00
03/22/2018	SAO	CO	Review and revise supplement to motion to strike claims 14 and 16.	6.80	750.00	\$5,100.00
03/22/2018	WNL	CO	Review and analyze revised version of Supplement to Motion to Strike.	1.40	850.00	\$1,190.00
03/22/2018	WNL	CO	Review correspondence re: strategy concerning fraud committed by Beitler parties and objections to claims.	0.20	850.00	\$170.00
03/23/2018	SAO	CO	Conference call with A. Friedman re Supplement to motion to strike claims and issues relating to a possible resolution of case.	0.30	750.00	\$225.00
03/23/2018	WNL	CO	Confer with T. Flanagan re: changes to Supplement to Motion to Strike.	0.30	850.00	\$255.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/23/2018	WNL	CO	Review correspondence re: changes to Supplement to Motion to Strike.	0.20	850.00	\$170.00
03/23/2018	WNL	CO	Review correspondence re: possible forgery of Betsy Boyd's initials.	0.10	850.00	\$85.00
03/23/2018	WNL	CO	Review redlined version of Supplement to Motion to Strike.	0.30	850.00	\$255.00
03/23/2018	WNL	CO	Review correspondence re: information allegedly needed to begin settlement negotiations.	0.10	850.00	\$85.00
03/23/2018	WNL	CO	Review and analyze discovery documents produced by Barry Beitler	1.30	850.00	\$1,105.00
03/24/2018	SAO	CO	Review and revised last draft of supplement in support of motion to strike.	0.50	750.00	\$375.00
03/24/2018	SAO	CO	Prepare declaration of Lori Gauthier in support of supplement to motion to strike claims.	0.40	750.00	\$300.00
03/24/2018	SAO	CO	Review and assemble evidence in support of supplement in motion to support claims.	0.30	750.00	\$225.00
03/24/2018	WNL	CO	Review and analyze draft Supplement to Motion to Strike.	0.90	850.00	\$765.00
03/24/2018	WNL	CO	Review correspondence re: Supplement to Motion to Strike Claims.	0.30	850.00	\$255.00
03/24/2018	WNL	CO	Telephone call with A. Friedman re: issues concerning content of Supplement to Motion to Strike.	0.20	850.00	\$170.00
03/24/2018	TCF	CO	Review and revise Supplemental to Motion to Strike Proofs of Claim.	1.60	650.00	\$1,040.00
03/24/2018	TCF	CO	Confer with W. Lobel regarding Supplemental to Motion to Strike Proofs of Claim.	0.10	650.00	\$65.00
03/25/2018	SAO	CO	Begin additional revisions to supplement to motion to strike claims.	1.10	750.00	\$825.00
03/25/2018	SAO	CO	Revise draft of brief on crime-fraud exception to privilege as part of supplement to motion to strike claims.	2.10	750.00	\$1,575.00
03/25/2018	SAO	CO	Revise declarations in support of Supplement to Motion to Strike Claims.	0.50	750.00	\$375.00
03/25/2018	TCF	CO	Research and review Supplemental to Motion to Strike Proofs of Claim, claim issues and drafting correspondence with respect thereto.	1.40	650.00	\$910.00
03/26/2018	NPL	CO	Review and reply to email from A. Friedman regarding fraud brief.	0.10	375.00	\$37.50
03/26/2018	NPL	CO	Review and reply to email from L. Gauthier regarding fraud brief, service, and filing.	0.20	375.00	\$75.00
03/26/2018	NPL	CO	Prepare service list for fraud brief; supplemental motion to strike; declarations of B. Gaschen and L.	0.30	375.00	\$112.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Gauthier.			
03/26/2018	NPL	CO	Confer with W. Lobel regarding fraud brief.	0.10	375.00	\$37.50
03/26/2018	NPL	CO	Review and reply to email from L. Gauthier regarding service list	0.10	375.00	\$37.50
03/26/2018	NPL	CO	Review and reply to email from L. Gauthier regarding Joint Discovery Stipulations.	0.10	375.00	\$37.50
03/26/2018	NPL	CO	Confer with W. Lobel regarding Joint Discovery Stipulations.	0.20	375.00	\$75.00
03/26/2018	NPL	CO	Revise and finalize Supplement to Motion Seeking (1) Dissallowance of Claims 14 and 16 and Motion to Strike.	1.40	375.00	\$525.00
03/26/2018	NPL	CO	Finalize declaration of B. Gaschen regarding supplement to motion to strike regarding claims nos 14 and 16.	0.40	375.00	\$150.00
03/26/2018	NPL	CO	Finalize declaration of L. Gauthier regarding supplement to motion to strike.	0.90	375.00	\$337.50
03/26/2018	NPL	CO	Lexis research regarding unpublished cases.	0.60	375.00	\$225.00
03/26/2018	NPL	CO	Prepare appendix of unpublished cases regarding supplement to motion to strike; forward same to A. Friedman for review.	0.40	375.00	\$150.00
03/26/2018	NPL	CO	Revise and finalize appendix of unpublished cases regarding supplement to motion to strike.	0.30	375.00	\$112.50
03/26/2018	NPL	CO	Revise and finalize special fraud brief relating to proofs of claim 9, 11, 14 and 16.	0.80	375.00	\$300.00
03/26/2018	NPL	CO	Review and reply to emails from A. Friedman regarding special fraud brief and supplement to motion to strike.	0.20	375.00	\$75.00
03/26/2018	NPL	CO	Telephone conference with L. Gauthier regarding supplement to motion to strike and special fraud brief.	0.20	375.00	\$75.00
03/26/2018	NPL	CO	Draft email to A. Friedman, W. Lobel, B. Gaschen and L. Gauthier regarding status of filing of special fraud brief, declarations, supplement to motion to strike and appendix of unpublished cases.	0.20	375.00	\$75.00
03/26/2018	NPL	CO	Draft email to T. Lallas regarding supplement to motion to strike, special fraud brief, declarations of B. Gaschen and L. Gauthier; and appendix of unpublished cases.	0.10	375.00	\$37.50
03/26/2018	SAO	CO	Final revise and to crime-fraud exception brief to accompany motion to strike claims.	0.50	750.00	\$375.00
03/26/2018	SAO	CO	Final revisions to supplement to motion to strike claims.	2.50	750.00	\$1,875.00
03/26/2018	WNL	CO	Review, analyze and comment on draft brief on application of the crime fraud exception to the	0.80	850.00	\$680.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			attorney client privilege.			
03/26/2018	WNL	CO	Review correspondence re: filing of various pleadings.	0.20	850.00	\$170.00
03/26/2018	WNL	CO	Review ans comment on Revised Supplement To Motion To Strike Claims.	0.90	850.00	\$765.00
03/26/2018	WNL	CO	Review correspondence re: Request to Dismiss Appeal and need to make changes in Motion to Strike.	0.10	850.00	\$85.00
03/26/2018	WNL	CO	Review correspondence re: exhibits to Supplement To Motion to Strike	0.10	850.00	\$85.00
03/26/2018	WNL	CO	Review additional correspondence re:Supplement To Motion To Strike Claims.	0.10	850.00	\$85.00
03/26/2018	WNL	CO	Review latest iteration of Supplement to Motion to Strike Claims.	0.60	850.00	\$510.00
03/26/2018	WNL	CO	Review additional correspondence re: revisions to Supplement to Motion to Strike.	0.20	850.00	\$170.00
03/26/2018	WNL	CO	Review correspondence re: service of brief on crime fraud exception to attorney cleint privilege.	0.10	850.00	\$85.00
03/26/2018	WNL	CO	Review and revise latest version of brief of crime/ fraud exception to attorney client privilege.	0.60	850.00	\$510.00
03/26/2018	WNL	CO	Review correspondence re: service of various pleadings.	0.10	850.00	\$85.00
03/26/2018	WNL	CO	Review correspondence re: most recent version of brief on crime/ fraud exception to attorney client privilege.	0.10	850.00	\$85.00
03/26/2018	WNL	CO	Review additional correspondence re: changes to brief re: crime/ fraud exception.	0.50	850.00	\$425.00
03/26/2018	WNL	CO	Additional review of brief on crime fraud exception to attorney client privilege.	0.30	850.00	\$255.00
03/26/2018	WNL	CO	Review latest changes to brief on crime fraud exception.	0.10	850.00	\$85.00
03/26/2018	WNL	CO	Draft correspondence re: latest changes to brief on crime/ fraud exception.	0.10	850.00	\$85.00
03/26/2018	WNL	CO	Review and comment on change of language of conclusion to brief on crime fraud exception.	0.10	850.00	\$85.00
03/26/2018	WNL	CO	Review and consider correspondence re: bad acts and remedies therefor.	0.10	850.00	\$85.00
03/26/2018	TCF	CO	Attend to matters regarding supplemental to motion to strike Proofs of Claim.	0.60	650.00	\$390.00
03/26/2018	TCF	CO	Telephone conference with A. Friedman regarding supplemental to motion to strike Proofs of Claim.	0.20	650.00	\$130.00
03/26/2018	TCF	CO	Review and analysis of issues regarding supplemental to motion to Strike Proofs of Claim.	0.20	650.00	\$130.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/26/2018	TCF	CO	Correspond with team regarding supplemental to motion to Strike Proofs of Claim.	0.20	650.00	\$130.00
03/26/2018	WNL	CO	Review correspondence re: unpublished opinions cited in brief re: crime/ fraud exception.	0.10	850.00	\$85.00
03/27/2018	WNL	CO	Review correspondence re: issues concerning unpublished cases in support of crime/fraud brief.	0.10	850.00	\$85.00
03/27/2018	WNL	CO	Review correspondence re: settlement negotiations.	0.10	850.00	\$85.00
03/27/2018	WNL	CO	Review Declaration of Beth Gaschen in support of Motion to Strike.	0.10	850.00	\$85.00
03/27/2018	WNL	CO	Review correspondence re: non-published cases cited in the brief.	0.10	850.00	\$85.00
03/28/2018	WNL	CO	Review correspondence re: action needed to prepare for hearing on April 18.	0.10	850.00	\$85.00
03/28/2018	WNL	CO	Review correspondence re: lack of good faith responses to electronic discovery requests	0.10	850.00	\$85.00
03/28/2018	WNL	CO	Review and respond to correspondence re: additional handwriting expert.	0.10	850.00	\$85.00
03/28/2018	WNL	CO	Telephone call with J. Bral re: various issues, including information requested concerning Mission, and possible settlement issues and strategy.	0.40	850.00	\$340.00
03/28/2018	WNL	CO	Telephone call with A. Friedman re: settlement and related issues.	0.20	850.00	\$170.00
03/28/2018	WNL	CO	Telephone call with Tom Lallas re: various issues including global settlement.	0.30	850.00	\$255.00
03/29/2018	WNL	CO	Review additional correspondence re: objections to claims.	0.20	850.00	\$170.00
03/29/2018	WNL	CO	Review proposed engagement letter with appraiser.	0.10	850.00	\$85.00
03/29/2018	WNL	CO	Review correspondence re: responses to brief on crime/ fraud exception.	0.20	850.00	\$170.00
03/29/2018	WNL	CO	Review additional correspondence re: preparation for April 18 hearing.	0.10	850.00	\$85.00
03/29/2018	WNL	CO	Telephone conference with G. Klausner and A. Friedman re: pending arbitrations, April 18 hearing and settlement issues.	0.50	850.00	\$425.00
03/29/2018	WNL	CO	Review additional correspondence re: preparation for April 18 hearing.	0.10	850.00	\$85.00
03/29/2018	WNL	CO	Review and analyze legal and factual issues to be argued at 4/18/18 hearing.	1.70	850.00	\$1,445.00
03/30/2018	WNL	CO	Review pleadings to be filed for April 18 hearing.	0.10	850.00	\$85.00
03/30/2018	WNL	CO	Review correspondence re: guarantees by J. Bral of Mission and Westcliff indebtedness.	0.10	850.00	\$85.00
03/30/2018	WNL	CO	Review additional correspondence re: timing issues	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			regarding April 18 hearing.			
03/30/2018	WNL	CO	Review correspondence re: issues raised by guarantee claims and alternative means of dealing with them.	0.20	850.00	\$170.00
03/30/2018	WNL	CO	Review additional correspondence re: issues and alternatives in dealing with guarantee claims on Mission and Westcliff property loans.	0.10	850.00	\$85.00
03/30/2018	WNL	CO	Telephone call with A. Friedman re: issues concerning testimony of T. Lallas.	0.20	850.00	\$170.00
03/30/2018	WNL	CO	Review correspondence re: subpoenas for April 18 hearing.	0.10	850.00	\$85.00
03/30/2018	WNL	CO	Review and sign subpoenas and review related correspondence.	0.10	850.00	\$85.00
03/30/2018	WNL	CO	Confer with N. Lockwood re: service of subpoenas for April 18 hearing.	0.10	850.00	\$85.00
03/30/2018	WNL	CO	Telephone call with handwriting expert.	0.20	850.00	\$170.00
03/30/2018	WNL	CO	Review correspondence re: notice of evidentiary hearing.	0.10	850.00	\$85.00
03/30/2018	WNL	CO	Review additional correspondence re: subpoenas on B. Beitler and D. Rezak.	0.10	850.00	\$85.00
03/30/2018	WNL	CO	Review correspondence re: subpoena to B. Boyd and related correspondence.	0.20	850.00	\$170.00
03/30/2018	WNL	CO	Review correspondence re: use of handwriting expert.	0.10	850.00	\$85.00
03/30/2018	WNL	CO	Review correspondence re: service on B. Boyd.	0.10	850.00	\$85.00
03/30/2018	WNL	CO	Review correspondence re: issues concerning April 18 hearing.	0.20	850.00	\$170.00
03/30/2018	WNL	CO	Review correspondence re: use of handwriting expert testimony.	0.10	850.00	\$85.00
03/30/2018	WNL	CO	Review additional correspondence re: preparation for April 18 hearing.	0.10	850.00	\$85.00
03/30/2018	WNL	CO	Review engagement documents from handwriting expert.	0.20	850.00	\$170.00
03/30/2018	WNL	CO	Draft correspondence re: engagement of handwriting expert.	0.10	850.00	\$85.00
03/30/2018	WNL	CO	Review order denying Motion to Strike T. Lallas declaration.	0.10	850.00	\$85.00
114.90						\$85,845.00

Litigation (Non-Bankruptcy)

03/01/2018	NPL	LN	Confer with L. Gauthier regarding joint statement regarding Bral v. Westcliff arbitration; revisions to	0.60	375.00	\$225.00
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			same; draft email to L. Gauthier regarding same.			
03/01/2018	SAO	LN	Conference call with A. Friedman re comments on joint statement re discovery dispute in arbitration case.	0.30	750.00	\$225.00
03/01/2018	SAO	LN	Review response to Joint Statement re discovery dispute in arbitration.	0.40	750.00	\$300.00
03/01/2018	WNL	LN	Review and analyze draft joint statement of discovery disputes.	0.20	850.00	\$170.00
03/01/2018	WNL	LN	Review correspondence re: changes needed to draft statement of discovery disputes.	0.10	850.00	\$85.00
03/01/2018	WNL	LN	Review additional correspondence re: joint statement re: discovery disputes.	0.10	850.00	\$85.00
03/02/2018	SAO	LN	Access filings with O.C. Recorder to ascertain whether or not co-managerial status is confirmed re Westcliff Investors.	1.00	750.00	\$750.00
03/02/2018	SAO	LN	Draft final insert to Joint Statement re discovery dispute pending before arbitration.	2.20	750.00	\$1,650.00
03/02/2018	SAO	LN	Conference call with A. Friedman re declaration by T. Lallas attempting to file two unauthenticated documents.	0.20	750.00	\$150.00
03/02/2018	WNL	LN	Review and comment on Joint Statement Re; Discovery Disputes, including the Reply.	0.50	850.00	\$425.00
03/02/2018	WNL	LN	Review and respond to latest Beitler pleadings.	0.20	850.00	\$170.00
03/02/2018	WNL	LN	Telephone cal with A. Friedman re: filings by Beitler and additional forged documents.	0.30	850.00	\$255.00
03/02/2018	WNL	LN	Review and analyze language of Joint Statement re: Arbitration.	0.20	850.00	\$170.00
03/02/2018	WNL	LN	Review comments to draft Joint Statement re: arbitration.	0.10	850.00	\$85.00
03/02/2018	WNL	LN	Review Arbitrator's Order re: Joint Discovery Stipulation.	0.20	850.00	\$170.00
03/02/2018	WNL	LN	Draft comments to Evidentiary Objection and Motion to Strike.	0.10	850.00	\$85.00
03/05/2018	NPL	LN	Review and rely to email from L. Gauthier regarding order on joint statement; review same.	0.20	375.00	\$75.00
03/05/2018	WNL	LN	Review, analyze and comment on Motion to Strike Declaration of Tom Lallas and Evidentiary Objections.	0.40	850.00	\$340.00
03/05/2018	WNL	LN	Telephone call with A. Friedman re: Motion to Strike.	0.20	850.00	\$170.00
03/05/2018	WNL	LN	Review correspondence re: Motion to Strike.	0.10	850.00	\$85.00
03/05/2018	WNL	LN	Review correspondence re: exhibits to Lallas declaration.	0.10	850.00	\$85.00

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03/05/2018	WNL	LN	Review additional correspondence re: pending arbitrations.	0.10	850.00	\$85.00
03/05/2018	WNL	LN	Review correspondence re: JAMS mediation.	0.10	850.00	\$85.00
03/06/2018	SAO	LN	Draft debtor's part of joint stipulation re discovery dispute arising from Beitler's refusal to produce documents and evasive discovery responses.	5.90	750.00	\$4,425.00
03/06/2018	WNL	LN	Telephone calls with A. Friedman re: strategy and action to be taken.	0.60	850.00	\$510.00
03/06/2018	WNL	LN	Review and analyze draft Joint Discovery Stipulation.	1.80	850.00	\$1,530.00
03/06/2018	WNL	LN	Telephone call with A. Friedman re: comments on draft Joint Discovery Stipulation.	0.20	850.00	\$170.00
03/06/2018	WNL	LN	Review various correspondence re: Joint Discovery Stipulation.	0.20	850.00	\$170.00
03/06/2018	WNL	LN	Review Declaration of B. Beitler in support of Opposition to Motion to Strike.	0.10	850.00	\$85.00
03/06/2018	WNL	LN	Telephone call with A. Friedman re: significance of bank records.	0.10	850.00	\$85.00
03/06/2018	WNL	LN	Review correspondence re: bank records.	0.10	850.00	\$85.00
03/06/2018	WNL	LN	Telephone conference with H. Hochman re: pending issues.	0.10	850.00	\$85.00
03/06/2018	WNL	LN	Review correspondence re: discovery issues.	0.10	850.00	\$85.00
03/06/2018	WNL	LN	Review additional bank records.	0.10	850.00	\$85.00
03/06/2018	WNL	LN	Review and analyze comments re: preparation for pending hearing.	0.20	850.00	\$170.00
03/07/2018	SAO	LN	Revise joint stipulation re discovery disputes relating to motion to strike claims.	1.50	750.00	\$1,125.00
03/07/2018	WNL	LN	Review final version of Motion to Strike.	0.10	850.00	\$85.00
03/07/2018	WNL	LN	Review correspondence re: identity of potential arbiters.	0.10	850.00	\$85.00
03/07/2018	WNL	LN	Review correspondence re: discovery issues.	0.10	850.00	\$85.00
03/08/2018	WNL	LN	Review and respond to correspondence re: handwriting expert.	0.10	850.00	\$85.00
03/08/2018	WNL	LN	Review correspondence re: changes to Joint Discovery Stipulation.	0.60	850.00	\$510.00
03/08/2018	WNL	LN	Review index of Sargent Supplemental Production.	0.30	850.00	\$255.00
03/08/2018	WNL	LN	Review correspondence re: documents that would have been responsive to prior discovery requests.	0.10	850.00	\$85.00
03/09/2018	NPL	LN	Review and Rely to email from B. Anavim regarding Joint Statement regarding Bral v. Westcliff arbitration.	0.10	375.00	\$37.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/09/2018	WNL	LN	Review correspondence re: pending arbitration.	0.10	850.00	\$85.00
03/09/2018	WNL	LN	Review correspondence re: documents delivered from Levy, Small and Lallas.	0.10	850.00	\$85.00
03/09/2018	WNL	LN	Review correspondence re: Joint Discovery Stipulation.	0.10	850.00	\$85.00
03/09/2018	WNL	LN	Review additional re: responses for Joint Discovery Stipulation.	0.10	850.00	\$85.00
03/09/2018	WNL	LN	Review additional correspondence re: Joint Discovery Stipulation.	0.10	850.00	\$85.00
03/12/2018	WNL	LN	Review correspondence re: issues raised by production from Levene, Neale and BCRS in response to discovery requests.	0.10	850.00	\$85.00
03/12/2018	WNL	LN	Review index of documents produced by Betsy Boyd.	0.20	850.00	\$170.00
03/12/2018	WNL	LN	Review correspondence from AAA re: pending arbitration.	0.10	850.00	\$85.00
03/13/2018	SAO	LN	Begin preparation of another joint discovery dispute stipulation re BCRS's failure to produce any documents in connection with motion to strike subpoena.	1.50	750.00	\$1,125.00
03/13/2018	WNL	LN	Review correspondence re: final form of Scheduling Order.	0.10	850.00	\$85.00
03/14/2018	NPL	LN	Review and reply to email from L. Gauthier regarding Bral v. Westcliff joint statement.	0.10	375.00	\$37.50
03/14/2018	NPL	LN	Confer with A. Friedman regarding Bral v. Westcliff joint statement.	0.10	375.00	\$37.50
03/14/2018	SAO	LN	Draft status report re arbitration to Los Angeles Superior Court.	0.40	750.00	\$300.00
03/14/2018	SAO	LN	Review letter from Lallas to AAA re arbitration of Mission Investors dissolution.	0.10	750.00	\$75.00
03/14/2018	SAO	LN	Prepare joint statement re discovery dispute arising from Beitler & Associates failure to produce documents in response to subpoena.	3.90	750.00	\$2,925.00
03/15/2018	WNL	LN	Review and Respond to Correspondence regarding arbitration issues.	0.10	850.00	\$85.00
03/15/2018	WNL	LN	Review status report regarding Westcliff arbitration.	0.10	850.00	\$85.00
03/15/2018	WNL	LN	Review revisions to status report for Westcliff arbitration.	0.10	850.00	\$85.00
03/15/2018	WNL	LN	Review correspondence regarding arbitration procedures for dealing with discovery issues.	0.20	850.00	\$170.00
03/16/2018	NPL	LN	Review multiple emails regarding document production; brief review of same.	0.30	375.00	\$112.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/16/2018	WNL	LN	Review additional correspondence regarding Westcliff production by Beitler.	0.20	850.00	\$170.00
03/19/2018	WNL	LN	Telephone call with Alan Friedman re: settlement and related issues	0.20	850.00	\$170.00
03/19/2018	WNL	LN	Review correspondence re: potential settlement..	0.10	850.00	\$85.00
03/20/2018	WNL	LN	Telephone call with A. Friedman re: litigation strategy and related issues.	0.50	850.00	\$425.00
03/21/2018	WNL	LN	Telephone conference with A. Friedman re: settlement issues and alternatives.	0.30	850.00	\$255.00
03/21/2018	WNL	LN	Review correspondence regarding communication with AAA regarding arbitrations.	0.10	850.00	\$85.00
03/21/2018	WNL	LN	Review and analyze exhibits to proposed joint discovery stipulation.	0.70	850.00	\$595.00
03/22/2018	WNL	LN	Review correspondence re: inadvertently produced privileged documents.	0.10	850.00	\$85.00
03/22/2018	WNL	LN	Review correspondence re: arguments to be made re: altered Operating Agreement.	0.20	850.00	\$170.00
03/25/2018	WNL	LN	Draft correspondence re: modification of Amended to Motion to Strike.	0.10	850.00	\$85.00
03/26/2018	WNL	LN	Review correspondence re: Beitler Parties non-responsiveness re: Joint Discovery Stipulations.	0.10	850.00	\$85.00
03/27/2018	WNL	LN	Review correspondence re: substitution of counsel in pending state court litigation.	0.10	850.00	\$85.00
03/28/2018	SAO	LN	Review and respond to issue re securing a 2nd handwriting expert to address forgeries in Altered Operating Agreement.	0.20	750.00	\$150.00
03/29/2018	SAO	LN	Appear at hearing on status conference in LASC re Bral v. Westcliff.	1.20	750.00	\$900.00
03/30/2018	WNL	LN	Telephone call with A. Friedman re: guarantee claims against J. Bral in Mission and Westcliff and treatment of same in plan.	0.40	850.00	\$340.00
				32.80		\$25,335.00

Plan & Disclosure Stmt. [B320]

03/08/2018	NPL	PD	Attention to dates and deadlines related to amended plan and disclosure statement.	0.20	375.00	\$75.00
03/08/2018	WNL	PD	Confer with N. Lockwood re: scheduling order for plan process.	0.10	850.00	\$85.00
03/08/2018	WNL	PD	Review and revise draft scheduling order.	0.20	850.00	\$170.00
03/08/2018	WNL	PD	Confer with N. Lockwood re: preparation of scheduling order.	0.10	850.00	\$85.00
03/08/2018	NPL	PD	Prepare scheduling order regarding plan and	1.10	375.00	\$412.50

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			disclosure statement; forward same to W. Lobel for review.			
03/09/2018	TCF	PD	Telephone conference with A. Friedman regarding plan and disclosure statement, litigation strategy and go-forward plan.	0.20	650.00	\$130.00
03/09/2018	WNL	PD	Review correspondence and scheduling order.	0.10	850.00	\$85.00
03/09/2018	WNL	PD	Review revisions to Scheduling Order.	0.10	850.00	\$85.00
03/09/2018	NPL	PD	Review and reply to multiple emails from L. Gauthier and A. Friedman regarding scheduling order regarding plan and disclosure statement.	0.20	375.00	\$75.00
03/09/2018	NPL	PD	Revisions to scheduling order regarding plan and disclosure statement; forward same to A. Friedman for review.	0.40	375.00	\$150.00
03/09/2018	NPL	PD	Confer with W. Lobel regarding scheduling order regarding plan and disclosure statement.	0.10	375.00	\$37.50
03/14/2018	WNL	PD	Telephone conference with T. Flanagan re: status of negotiations and chapter 11 issues.	0.40	850.00	\$340.00
03/14/2018	WNL	PD	Review Scheduling Order re: plan and disclosure statement deadlines.	0.10	850.00	\$85.00
03/15/2018	WNL	PD	Review final version of scheduling order regarding Plan & Disclosure statement.	0.10	850.00	\$85.00
03/22/2018	WNL	PD	Review Court Order Re; Mandatory Information to be Included in Disclosure Statement.	0.20	850.00	\$170.00
03/30/2018	WNL	PD	Review correspondence re: potential issues to be dealt with in plan and disclosure statement.	0.10	850.00	\$85.00
				3.70	\$2,155.00	

Stay Litigation [B140]

03/01/2018	WNL	SL	Review reply and issues concerning scope of relief from stay.	0.40	850.00	\$340.00
03/01/2018	WNL	SL	Review and analyze declaration of Tom Lallas in support of Opposition re: motions for relief from stay.	0.20	850.00	\$170.00
03/01/2018	WNL	SL	Review and analyze declaration of M. Hurwetz re: motions for relief from stay.	0.10	850.00	\$85.00
03/01/2018	WNL	SL	Review and analyze Beitler Reply to Opposition to Motions for Relief from Stay and arguments raised in the Reply.	1.20	850.00	\$1,020.00
03/02/2018	WNL	SL	Review Reply To Motions For Relief and related correspondence.	0.30	850.00	\$255.00
03/02/2018	TCF	SL	Telephone conference with A. Friedman regarding reply to relief from stay Opposition and objection to evidence filed in support.	0.20	650.00	\$130.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/02/2018	TCF	SL	Review and analysis of reply to relief from stay Opposition and evidentiary issues.	1.00	650.00	\$650.00
03/02/2018	TCF	SL	Various correspondence with counsel regarding motion to strike declaration in support of relief from stay.	0.20	650.00	\$130.00
03/02/2018	TCF	SL	Telephone conferences with A. Friedman regarding motion to strike declaration filed in support of relief from stay.	0.30	650.00	\$195.00
03/02/2018	TCF	SL	Research regarding motion to strike declaration filed in support of relief from stay; evidentiary objections thereto.	0.90	650.00	\$585.00
03/02/2018	TCF	SL	Review and analysis of issues regarding motion to strike declaration; evidentiary objections with respect thereto.	0.30	650.00	\$195.00
03/02/2018	HDH	SL	Review and analyze of reply papers re stay motion	0.60	850.00	\$510.00
03/02/2018	WNL	SL	Review and analyze arguments and relevant documents re: pending hearing.	1.70	850.00	\$1,445.00
03/02/2018	WNL	SL	Review correspondence re: response of Beitler to Opposition to Motions for Relief.	0.20	850.00	\$170.00
03/03/2018	TCF	SL	Research relating to issues regarding motion to strike declaration and evidence filed in support thereof.	1.80	650.00	\$1,170.00
03/03/2018	TCF	SL	Draft evidentiary objections and motion to strike declaration filed in support of relief from stay reply.	3.20	650.00	\$2,080.00
03/03/2018	TCF	SL	Correspondence with A. Friedman regarding evidentiary objections and motion to strike declaration filed in support of relief from stay reply.	0.10	650.00	\$65.00
03/03/2018	TCF	SL	Research and analysis regarding motion to strike declaration filed in support of relief from stay reply.	0.20	650.00	\$130.00
03/04/2018	TCF	SL	Correspondence with A. Friedman regarding evidentiary issues in connection with relief from stay proceedings.	0.10	650.00	\$65.00
03/04/2018	TCF	SL	Correspondence with L. Gauthier regarding motion to strike and evidentiary objections.	0.10	650.00	\$65.00
03/05/2018	TCF	SL	Attend to issues regarding motion to strike and evidentiary issues.	0.10	650.00	\$65.00
03/05/2018	TCF	SL	Review and revise motion to strike evidence and declaration.	0.20	650.00	\$130.00
03/05/2018	TCF	SL	Correspondence with team regarding motion to strike evidence and declaration.	0.20	650.00	\$130.00
03/05/2018	NPL	SL	Review multiple emails from A. Friedman and T. Flanagan regarding Motion to Strike Declaration of T. Lallas filed in support of Reply to Opposition to Motions for Relief from Stay	0.20	375.00	\$75.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/05/2018	NPL	SL	Telephone conference with L. Gauthier regarding Motion to Strike Declaration of T. Lallas filed in support of Reply to Opposition to Motions for Relief from Stay	0.10	375.00	\$37.50
03/05/2018	NPL	SL	Revise and finalize Motion to Strike Declaration of T. Lallas filed in support of Reply to Opposition to Motions for Relief from Stay; confer with W. Lobel regarding same.	0.70	375.00	\$262.50
03/05/2018	NPL	SL	Draft email to T. Lallas regarding Motion to Strike Declaration of T. Lallas filed in support of Reply to Opposition to Motions for Relief from Stay.	0.10	375.00	\$37.50
03/05/2018	NPL	SL	Review and reply to email from L. Gauthier regarding Motion to Strike Declaration of T. Lallas filed in support of Reply to Opposition to Motions for Relief from Stay; confer with L. Gauthier regarding same.	0.20	375.00	\$75.00
03/05/2018	NPL	SL	Prepare counsel for hearing on motions for relief from stay; confer with L. Gauthier regarding same; review and reply to email from L. Gauthier regarding same.	0.60	375.00	\$225.00
03/05/2018	WNL	SL	Review final version of Debtor's Response to opposition to Motion to Strike.	0.10	850.00	\$85.00
03/05/2018	WNL	SL	Review draft of Evidentiary Objections and Motion to Strike paragraph 2 of Tom Lallas Declaration.	0.40	850.00	\$340.00
03/05/2018	WNL	SL	Review correspondence re: preparation for hearing on 4/18.	0.10	850.00	\$85.00
03/05/2018	WNL	SL	Review additional correspondence re: changes to Evidentiary Objections and Motion to Strike.	0.20	850.00	\$170.00
03/05/2018	WNL	SL	Review revised Evidentiary Objections and Motions to Strike.	0.30	850.00	\$255.00
03/05/2018	WNL	SL	Review and analyze documents and pleadings relevant to issues at 4/18 hearing.	0.80	850.00	\$680.00
03/05/2018	WNL	SL	Review additional change to Evidentiary Objections and Motion to Strike.	0.10	850.00	\$85.00
03/05/2018	WNL	SL	Review additional correspondence re: additional changes to Evidentiary Objections and Motion to Strike.	0.10	850.00	\$85.00
03/06/2018	HDH	SL	Draft analysis of arguments and responses in preparation for hearing	0.50	850.00	\$425.00
03/06/2018	WNL	SL	Review and analyze correspondence re: opposition to Motion to Strike Declaration of Tom Lallas.	0.10	850.00	\$85.00
03/06/2018	WNL	SL	Review and analyze Opposition to Motion to Strike.	0.40	850.00	\$340.00
03/06/2018	WNL	SL	Review and analyze comments re: Beitler pleadings in stay relief matter	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/06/2018	WNL	SL	Review correspondence re: preparation for pending hearing.	0.10	850.00	\$85.00
03/06/2018	WNL	SL	Review transcript of hearing on Motions for Relief held on 3/8.	1.30	850.00	\$1,105.00
03/07/2018	TCF	SL	Draft response to evidentiary issues in connection with motion for relief from stay.	3.20	650.00	\$2,080.00
03/07/2018	TCF	SL	Various correspondence with counsel regarding response to evidentiary issues in connection with motion for relief from stay, and discovery-related matters.	0.20	650.00	\$130.00
03/07/2018	TCF	SL	Telephone conference with A. Friedman regarding response to evidentiary issues in connection with motion for relief from stay, and discovery-related matters.	0.20	650.00	\$130.00
03/07/2018	NPL	SL	Multiple telephone conferences with B. Anavim regarding response to opposition to motion to strike declaration of T. Lallas.	0.50	375.00	\$187.50
03/07/2018	HDH	SL	Review reply (.2).	0.20	850.00	\$170.00
03/07/2018	HDH	SL	Review and analyze of opposition to motion to strike (.7).	0.70	850.00	\$765.00
03/07/2018	WNL	SL	Review and analyze all relevant pleadings and begin preparation for hearing on Motions for relief from Stay.	5.90	850.00	\$5,015.00
03/07/2018	WNL	SL	Conferences with A. Friedman re: issues and arguments to be made at hearing on Motions for Relief from Stay.	2.40	850.00	\$2,040.00
03/07/2018	WNL	SL	Review declaration of J. Bral in support of Response to Opposition to Debtor's Motion to Strike Declaration of Tom Lallas.	0.10	850.00	\$85.00
03/07/2018	WNL	SL	Review and analyze proposed Rep[ly re: Motion to Strike Declaration of Tom Lallas.	0.30	850.00	\$255.00
03/07/2018	WNL	SL	Review and analyze draft Opposition to Motion to Strike Lallas Declaration.	0.30	850.00	\$255.00
03/07/2018	WNL	SL	Review correspondence re: newly discovered evidence.	0.20	850.00	\$170.00
03/07/2018	WNL	SL	Review additional correspondence re: discovery issues and new evidence.	0.20	850.00	\$170.00
03/08/2018	WNL	SL	Prepare for hearing on motions for relief from stay, including conferences with A. Friedman.	2.80	850.00	\$2,380.00
03/08/2018	WNL	SL	Attendance at hearing on Motions for Relief from Stay.	2.40	850.00	\$2,040.00
03/08/2018	NPL	SL	Confer with W. Lobel regarding status of hearing on motions for relief from stay.	0.10	375.00	\$37.50

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03/08/2018	NPL	SL	Review tentative rulings regarding motions for relief from stay.	0.10	375.00	\$37.50
03/08/2018	NPL	SL	Attention to attorney service order regarding response to reply to objection to declaration of T. Lallas; review and reply to multiple emails regarding same; confer with attorney service regarding same; confer with T. Gauthier regarding same.	0.40	375.00	\$150.00
03/08/2018	NPL	SL	Confer with W. Lobel regarding hearing on motions for relief from stay.	0.10	375.00	\$37.50
03/08/2018	WNL	SL	Draft summary of results of hearing on Motions for Relief from Stay.	0.10	850.00	\$85.00
03/08/2018	WNL	SL	Review correspondence re: results of hearing on Motions for Relief from Stay.	0.10	850.00	\$85.00
03/09/2018	NPL	SL	Review and reply to email from L. Gauthier regarding transcript for hearing on motions for relief from stay; prepare and finalize transcript request form regarding same.	0.40	375.00	\$150.00
03/09/2018	NPL	SL	Telephone call with H. Martens regarding transcript request; review and reply to email from H. Martens regarding same.	0.30	375.00	\$112.50
03/09/2018	WNL	SL	Telephone call with A. Friedman re: results of hearing and course of action to pursue given the Court's ruling.	0.70	850.00	\$595.00
03/09/2018	WNL	SL	Review correspondence re: final form of Scheduling Order.	0.10	850.00	\$85.00
03/09/2018	WNL	SL	Review correspondence re: documents from Pacific Western Bank.	0.10	850.00	\$85.00
03/09/2018	WNL	SL	Review correspondence re: stay relief issues.	0.10	850.00	\$85.00
03/12/2018	NPL	SL	Review and reply to email from H. Martens regarding transcript on motions for relief from same; attention to specifics of same.	0.20	375.00	\$75.00
03/12/2018	NPL	SL	Draft email to A. Friedman regarding transcript on motions for relief stay.	0.10	375.00	\$37.50
03/12/2018	NPL	SL	Review transcript of hearing on motions for relief from stay.	0.30	375.00	\$112.50
03/12/2018	SAO	SL	Conference call with A. Friedman re prospective strategy based upon recent relief from stay hearing and preparation of additional joint statement re discovery issues with Levy Small & Lallas Firm, BCBS and Levene Firm.	0.70	750.00	\$525.00
03/13/2018	WNL	SL	Review correspondence re: transcript of hearing on Motions for Relief from Stay.	0.10	850.00	\$85.00
03/13/2018	WNL	SL	Review and analyze transcript of hearing on Motions for Relief from Stay.	1.20	850.00	\$1,020.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/13/2018	WNL	SL	Review and approve language of scheduling order.	0.10	850.00	\$85.00
03/15/2018	WNL	SL	Review correspondence regarding arbitration and effect of automatic stay.	0.10	850.00	\$85.00
03/19/2018	WNL	SL	Review and analyze transcript of hearing on motions for relief from stay.	0.90	850.00	\$765.00
03/19/2018	WNL	SL	Telephone call with A. Friedman re: scope of relief from stay issues.	0.40	850.00	\$340.00
03/19/2018	SAO	SL	Review relief from stay order and prepare alternative insert describing relief granted.	0.60	750.00	\$450.00
03/19/2018	SAO	SL	Review transcript of relief from stay hearing to ascertain court's perspective on what was to be decided in arbitrations.	0.40	750.00	\$300.00
03/19/2018	WNL	SL	Telephone call with A. Friedman re: hearing on motion for relief from stay and scope of arbitrations.	0.20	850.00	\$170.00
03/19/2018	WNL	SL	Review correspondence re: Court's ruling at relief from stay hearing.	0.10	850.00	\$85.00
03/19/2018	WNL	SL	Review correspondence regarding meaning of court's language in ruling on stay relief motions.	0.30	850.00	\$255.00
03/19/2018	WNL	SL	Review and analyze language of court in granting motions for relief from stay.	0.50	850.00	\$425.00
03/19/2018	WNL	SL	Review correspondence regarding language of court in making ruling.	0.20	850.00	\$170.00
03/20/2018	WNL	SL	Draft comments to proposed new language to be inserted into the relief from stay orders.	0.10	850.00	\$85.00
03/20/2018	SAO	SL	Revise relief from stay orders.	0.50	750.00	\$375.00
03/20/2018	WNL	SL	Telephone call with G. Klausner and A. Friedman re: scope of relief from stay orders	0.90	850.00	\$765.00
03/20/2018	WNL	SL	Telephone call with A. Friedman re: pending telephone call with G. Klausner e: scope of relief from stay matters.	0.20	850.00	\$170.00
03/20/2018	WNL	SL	Review and analyze proposed language to include in order granting relief from stay.	0.20	850.00	\$170.00
03/20/2018	WNL	SL	Review comments to proposed order granting relief from stay.	0.10	850.00	\$85.00
03/20/2018	WNL	SL	Review correspondence regarding need for separate orders for relief from stay.	0.10	850.00	\$85.00
03/20/2018	WNL	SL	Review additional correspondence regarding language of relief from stay orders.	0.20	850.00	\$170.00
03/20/2018	WNL	SL	Review correspondence regarding proposed changes in orders granting relief from stay.	0.10	850.00	\$85.00
03/26/2018	TCF	SL	Correspond with team regarding Beitler's proposed orders on relief from stay (arbitration).	0.10	650.00	\$65.00

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03/26/2018	TCF	SL	Review and analysis of transcript of hearing on relief from stay (arbitration).	1.00	650.00	\$650.00
03/26/2018	NPL	SL	Confer with T. Flanagan regarding transcript for relief from stay hearing; draft email to T. Flanagan regarding same.	0.20	375.00	\$75.00
03/26/2018	WNL	SL	Telephone call with A. Friedman re: order filed by G. Klausner re: order for relief from stay.	0.20	850.00	\$170.00
03/26/2018	WNL	SL	Review correspondence re: response to form of order we filed.	0.10	850.00	\$85.00
03/26/2018	WNL	SL	Telephone call with A. Friedman re: responses to orders filed by Beitler re: relief from stay.	0.20	850.00	\$170.00
03/26/2018	WNL	SL	Review and reply to correspondence re: proposed orders granting relief from stay.	0.20	850.00	\$170.00
03/26/2018	WNL	SL	Confer with T. Flanagan re: objection to proposed orders granting relief from stay.	0.10	850.00	\$85.00
03/27/2018	TCF	SL	Draft objection to form of orders on relief from stay (arbitration).	5.40	650.00	\$3,510.00
03/27/2018	TCF	SL	Revisions to objection to form of orders on relief from stay (arbitration).	0.30	650.00	\$195.00
03/27/2018	NPL	SL	Confer with T. Flanagan regarding objections to RFS orders.	0.20	375.00	\$75.00
03/27/2018	NPL	SL	Review email from T. Flanagan regarding objections to relief from stay orders.	0.10	375.00	\$37.50
03/27/2018	WNL	SL	Review and analyze draft objection to proposed form of orders granting relief from stay.	0.90	850.00	\$765.00
03/27/2018	WNL	SL	Review final form of pleadings before filing.	0.30	850.00	\$255.00
03/28/2018	TCF	SL	Draft alternative forms of orders on relief from stay (arbitration).	0.20	650.00	\$130.00
03/28/2018	TCF	SL	Various correspondence with team regarding objection to form of orders on relief from stay (arbitration).	0.20	650.00	\$130.00
03/28/2018	NPL	SL	Draft email to A. Friedman regarding form of orders regarding objection to form of orders regarding Beitler parties motions for relief from stay.	0.10	375.00	\$37.50
03/28/2018	NPL	SL	Continued revisions to objection to form of orders regarding Beitler parties motions for relief from stay.	0.70	375.00	\$262.50
03/28/2018	NPL	SL	Assist T. Flanagan regarding objection to form of orders regarding Beitler parties motions for relief from stay.	2.10	375.00	\$787.50
03/28/2018	NPL	SL	Confer with W. Lobel regarding objection to form of orders regarding Beitler parties motions for relief from stay.	0.10	375.00	\$37.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/28/2018	NPL	SL	Assist J. O'Keefe regarding revisions to objection to form of orders regarding Beitler parties motions for relief from stay.	0.70	375.00	\$262.50
03/28/2018	NPL	SL	Review multiple emails from S. O'Keefe, T. Flanagan and A. Friedman regarding objection to form orders regarding Beitler parties motions for relief from stay.	0.20	375.00	\$75.00
03/28/2018	NPL	SL	Draft email to L. Gauthier regarding objection to form of orders regarding Beitler parties motions for relief from stay; review and reply to email from L. Gauthier regarding same.	0.10	375.00	\$37.50
03/28/2018	SAO	SL	Review and provide comments on form of relief from stay orders.	0.20	750.00	\$150.00
03/28/2018	WNL	SL	Review correspondence re: orders on Motions for Relief from Stay.	0.10	850.00	\$85.00
03/28/2018	WNL	SL	Review correspondence re: objections to form of orders.	0.10	850.00	\$85.00
03/28/2018	WNL	SL	Review correspondence re: preparation of alternative orders.	0.10	850.00	\$85.00
03/28/2018	WNL	SL	Review additional correspondence re: objections to proposed orders granting relief from stay.	0.10	850.00	\$85.00
03/28/2018	WNL	SL	Review and comment on revised objection to form of proposed orders granting relief.	0.40	850.00	\$340.00
03/28/2018	WNL	SL	Review and analyze draft alternative orders granting relief from stay.	0.30	850.00	\$255.00
03/28/2018	WNL	SL	Review correspondence re: one additional change to language of alternative forms of order modifying stay.	0.10	850.00	\$85.00
03/28/2018	WNL	SL	Review final version of objection to form of relief from stay order.	0.20	850.00	\$170.00
03/28/2018	WNL	SL	Review revised alternative orders granting relief from stay.	0.10	850.00	\$85.00
03/28/2018	WNL	SL	Review and analyze proposed language for alternative orders.	0.20	850.00	\$170.00
03/28/2018	WNL	SL	Review additional language re: language of proposed alternative orders.	0.10	850.00	\$85.00
03/29/2018	NPL	SL	Revise form orders regarding objection to Beitler parties motions for relief from stay.	0.40	375.00	\$150.00
03/29/2018	NPL	SL	Telephone call with L. Gauthier regarding objection to form of orders regarding Beitler parties motions for relief from stay.	0.10	375.00	\$37.50
03/29/2018	NPL	SL	Continued revisions to objection to form of orders regarding Beitler parties motions for relief from stay.	1.30	375.00	\$487.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/29/2018	WNL	SL	`Review correspondence re: Opposition to proposed Orders granting Relief From Stay.	0.10	850.00	\$85.00
03/29/2018	WNL	SL	Review correspondence re: filing issues.	0.20	850.00	\$170.00
03/29/2018	WNL	SL	Review additional correspondence re: additional changes in Objection to forms of Orders Granting Relief from Stay.	0.10	850.00	\$85.00
03/29/2018	WNL	SL	Review order denying Motion to Strike Declaration of Tom Lallas in Support of Reply to Opposition to Motions for Relief from Stay.	0.10	850.00	\$85.00
03/29/2018	WNL	SL	Review additional correspondence re: pleadings to be filed.	0.10	850.00	\$85.00
03/30/2018	NPL	SL	Draft email to A. Friedman regarding form of orders regarding Beitler parties motions for relief from stay.	0.10	375.00	\$37.50
03/30/2018	NPL	SL	Review entered order denying motion to strike Lallas declaration.	0.10	375.00	\$37.50
03/30/2018	NPL	SL	Telephone call with L. Gauthier regarding Order denying motion to strike Lallas declaration.	0.10	375.00	\$37.50
03/30/2018	NPL	SL	Review and reply to email from L. Gauthier regarding objection to form relief from stay orders.	0.10	375.00	\$37.50
03/30/2018	NPL	SL	Telephone call with L. Gauthier regarding objection to form of orders regarding Beitler parties motions for relief from stay.	0.10	375.00	\$37.50
03/30/2018	NPL	SL	Draft email to T. Lallas regarding objection to form orders regarding Beitler parties motions for relief from stay.	0.10	375.00	\$37.50
03/30/2018	NPL	SL	Finalize form order exhibits regarding objection to form orders regarding Beitler parties motions for relief from stay.	0.60	375.00	\$225.00
03/30/2018	NPL	SL	Revise and finalize objection to form orders regarding Beitler parties motions for relief from stay	0.90	375.00	\$337.50
03/30/2018	WNL	SL	Review and analyze Beitler objection to form of order granting relief from stay.	0.50	850.00	\$425.00
03/30/2018	WNL	SL	Review Debtor's objection to forms of orders submitted by B. Beitler.	0.40	850.00	\$340.00
					72.20	\$51,280.00
TOTAL SERVICES FOR THIS MATTER:						\$170,795.00

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Expenses

03/05/2018	OS	Courtesy Copy to Judges chambers of Mtn. to Strike Dec. of T. Lallas filed and support of reply to Motions for RFS.	15.25
03/07/2018	TE	Travel Expense [E110] - Parking (WNL)	14.00
03/20/2018	TR	Transcript [E116] Briggs Reporting Company	76.80
03/20/2018	TR	Transcript [E116] Briggs Reporting Company.	484.00
03/26/2018	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
03/26/2018	RE2	SCAN/COPY (165 @0.10 PER PG)	16.50
03/26/2018	RE2	SCAN/COPY (165 @0.10 PER PG)	16.50
03/26/2018	RE2	SCAN/COPY (80 @0.10 PER PG)	8.00
03/26/2018	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
03/26/2018	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
03/26/2018	RE2	SCAN/COPY (29 @0.10 PER PG)	2.90
03/26/2018	RE2	SCAN/COPY (29 @0.10 PER PG)	2.90
03/26/2018	RE2	SCAN/COPY (64 @0.10 PER PG)	6.40
03/26/2018	RE2	SCAN/COPY (35 @0.10 PER PG)	3.50
03/26/2018	RE2	SCAN/COPY (81 @0.10 PER PG)	8.10
03/26/2018	SO	Secretarial Overtime Jennfer O'Keefe	89.29
03/27/2018	OS	GSO, Inv. 3597631, Ronald Reagan Fed. Building	9.61
03/28/2018	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
03/28/2018	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
03/30/2018	OS	GSO, Inv. 3597631, Ronald Reagan Fed. Building	22.47

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03/30/2018	RE2	SCAN/COPY (103 @0.10 PER PG)	10.30
03/31/2018	PAC	Pacer - Court Research	25.40
Total Expenses for this Matter			\$818.42

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REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For current services rendered through 03/31/2018

Total Fees	\$170,795.00
Chargeable costs and disbursements	\$818.42
Total Due on Current Invoice.....	\$171,613.42

Outstanding Balance from prior Invoices as of 03/31/2018 **(May not reflect recent payments)**

Invoice Number	Invoice Date	Fees Billed	Expenses Billed	Balance Due
118521	01/31/2018	\$64,977.50	\$1.40	\$64,978.90
118768	02/28/2018	\$89,105.00	\$6,717.72	\$95,822.72
Total Amount Due on Current and Prior Invoices				\$332,415.04

Pachulski Stang Ziehl & Jones LLP

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

April 30, 2018
Invoice 119338
Client 10601
Matter 00001
WNL

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 04/30/2018

FEES	\$241,285.00
EXPENSES	\$12,901.06
TOTAL CURRENT CHARGES	\$254,186.06
BALANCE FORWARD	\$332,415.04
TOTAL BALANCE DUE	\$586,601.10

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	11.60	\$9,600.00
AC	Avoidance Actions	0.20	\$130.00
AD	Asset Disposition [B130]	1.20	\$1,020.00
BL	Bankruptcy Litigation [L430]	6.10	\$4,865.00
CA	Case Administration [B110]	7.10	\$5,195.00
CO	Claims Admin/Objections[B310]	174.10	\$125,035.00
EMP	Employment of Professionals	1.60	\$880.00
FP	Fees of Professionals	0.40	\$100.00
LN	Litigation (Non-Bankruptcy)	9.00	\$7,480.00
PD	Plan & Disclosure Stmt. [B320]	121.50	\$83,975.00
RFS	Relief from Stay	2.40	\$1,560.00
TI	Tax Issues [B240]	1.70	\$1,445.00
		<hr/> 336.90	<hr/> \$241,285.00

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	26.90	\$6,725.00
SAOS	O'Keefe, Sean A	Counsel	750.00	75.40	\$56,550.00
TCF	Flanagan, Tavi C.	Counsel	650.00	105.30	\$68,445.00
WNL	Lobel, William N.	Partner	0.00	0.40	\$0.00
WNL	Lobel, William N.	Partner	850.00	128.90	\$109,565.00
			<hr/> 336.90	<hr/> \$241,285.00	

Summary of Expenses

<u>Description</u>	<u>Amount</u>
CourtLink	\$19.78
Guest Parking [E124]	\$2.75

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Outside Services	\$12,469.17
Pacer - Court Research	\$38.10
Postage [E108]	\$56.83
Reproduction/ Scan Copy	\$176.20
Overtime	\$135.48
Travel Expense [E110]	\$2.75
	<hr/> \$12,901.06

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
04/05/2018	WNL	AA	Review and analyze issues concerning valuation of partnership interests owned by John Bral and valuation of same for buyout purposes.	0.70	850.00	\$595.00
04/05/2018	WNL	AA	Review correspondence re: retention of appraiser.	0.10	850.00	\$85.00
04/05/2018	WNL	AA	Review additional correspondence re: retention of appraiser.	0.10	850.00	\$85.00
04/05/2018	WNL	AA	Review correspondence re: retention of appraisers.	0.10	850.00	\$85.00
04/16/2018	WNL	AA	Review correspondence re: engagement of appraiser for Sandpiper house.	0.10	850.00	\$85.00
04/18/2018	WNL	AA	Review correspondence and confer with John Bral re: appraisal of Sandpiper property.	0.20	850.00	\$170.00
04/19/2018	WNL	AA	Review correspondence re: appraisal of Sandpiper property.	0.10	850.00	\$85.00
04/19/2018	WNL	AA	Review correspondence re: appraisal issues.	0.10	850.00	\$85.00
04/20/2018	WNL	AA	review correspondence and analyze issues concerning valuation of J. Bral's interests in various entities.	0.40	850.00	\$340.00
04/23/2018	WNL	AA	Review correspondence re: J. Bral's percentage interests in Mission and Westcliff.	0.10	850.00	\$85.00
04/24/2018	WNL	AA	Review appraisal of 664 Sandpiper property and related correspondence.	0.20	850.00	\$170.00
04/24/2018	WNL	AA	Review correspondence re: tax return signed by Barry Beitler for Mission entity.	0.10	850.00	\$85.00
04/25/2018	WNL	AA	Review correspondence and relevant cases re: calculation of payment amount if dissolution suit is brought.	1.70	850.00	\$1,445.00
04/25/2018	WNL	AA	Review and analyze appraisal of Sandppiper property.	0.20	850.00	\$170.00
04/25/2018	WNL	AA	Review memo and related correspondence re: rights of parties re: disposition of John Bral's interest in LLC.	0.50	850.00	\$425.00
04/25/2018	WNL	AA	Review results of research re: right to sell Debtor's interest in LLC.	0.90	850.00	\$765.00
04/25/2018	WNL	AA	Review and analyze correspondence and issues re: sale of Debtor's interests in LLCs.	0.20	850.00	\$170.00
04/27/2018	WNL	AA	Review correspondence re: terms of Mission Medical operating Agreement.	0.10	850.00	\$85.00
04/27/2018	WNL	AA	Review appraisal of Mission project and related correspondence.	0.80	850.00	\$680.00
04/27/2018	WNL	AA	Review appraisal of Westcliff property and related correspondence.	0.60	850.00	\$510.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/28/2018	TCF	AA	Review and analysis of correspondence regarding dissolution and sale issues.	0.10	650.00	\$65.00
04/28/2018	TCF	AA	Review and analysis of documents regarding dissolution and sale issues; draft correspondence same.	1.00	650.00	\$650.00
04/28/2018	TCF	AA	Various communications with team regarding dissolution and sale issues.	0.20	650.00	\$130.00
04/28/2018	WNL	AA	Review correspondence re: appraisals.	0.10	850.00	\$85.00
04/28/2018	WNL	AA	Review Mission Operating Agreement re: sale of property without a dissolution action.	0.60	850.00	\$510.00
04/28/2018	WNL	AA	Review and analyze issues re: sale of Mission property without a dissolution action.	0.20	850.00	\$170.00
04/28/2018	WNL	AA	Review correspondence re: sale of Mission property without a dissolution action.	0.10	850.00	\$85.00
04/28/2018	WNL	AA	Review correspondence re: claims against LA condo.	0.10	850.00	\$85.00
04/30/2018	WNL	AA	Review and comment of declaration of appraiser of Sandpiper property.	0.10	850.00	\$85.00
04/30/2018	WNL	AA	Review appraisals and draft correspondence to John Bral re: same.	0.50	850.00	\$425.00
04/30/2018	WNL	AA	Review correspondence re: declarations in support of appraisals.	0.10	850.00	\$85.00
04/30/2018	WNL	AA	Review additional correspondence re: declarations in support of appraisals.	0.10	850.00	\$85.00
04/30/2018	WNL	AA	Review additional correspondence re: declaration of J. Pyster.	0.10	850.00	\$85.00
04/30/2018	WNL	AA	Review and respond to correspondence re: appraisals.	0.10	850.00	\$85.00
04/30/2018	WNL	AA	Review additional correspondence re: appraisal declarations.	0.10	850.00	\$85.00
04/30/2018	WNL	AA	Review additional correspondence re: declaration of appraiser.	0.10	850.00	\$85.00
04/30/2018	WNL	AA	Review appraisal of Coffee Road Plaza project and related correspondence.	0.20	850.00	\$170.00
04/30/2018	WNL	AA	Review signed declaration of John Pyster and related correspondence.	0.10	850.00	\$85.00
04/30/2018	WNL	AA	Review comments to the declaration of John Pfyl.	0.10	850.00	\$85.00
04/30/2018	WNL	AA	Review correspondence re: ownership of B. Beitler and J. Bral in Westcliff.	0.10	850.00	\$85.00
04/30/2018	WNL	AA	Review Scott Pfyl's comments to his declaration.	0.10	850.00	\$85.00
04/30/2018	WNL	AA	Review correspondence re: value of debtor's interest in VFG.	0.10	850.00	\$85.00

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				11.60		\$9,600.00
Avoidance Actions						
04/05/2018	TCF	AC	Review and analysis of avoidance action issues.	0.20	650.00	\$130.00
				0.20		\$130.00

Asset Disposition [B130]

04/28/2018	WNL	AD	Review and analyze Operating Agreement of Mission re: right to sell property.	0.60	850.00	\$510.00
04/28/2018	WNL	AD	Review and analyze correspondence re: right to sell Mission.	0.20	850.00	\$170.00
04/28/2018	WNL	AD	Draft correspondence re: potential sale of Mission.	0.10	850.00	\$85.00
04/28/2018	WNL	AD	Review and respond to correspondence re: potential sale of Mission property.	0.10	850.00	\$85.00
04/28/2018	WNL	AD	Review correspondence re: security documents on various properties.	0.10	850.00	\$85.00
04/28/2018	WNL	AD	Review correspondence re: management of Mission.	0.10	850.00	\$85.00
				1.20		\$1,020.00

Bankruptcy Litigation [L430]

04/02/2018	TCF	BL	Review and analysis of correspondence from A. Friedman regarding arbitration proceedings.	0.10	650.00	\$65.00
04/04/2018	NPL	BL	Review joint status reports filed in 3 adversary matters.	0.20	250.00	\$50.00
04/05/2018	WNL	BL	Analyze settlement issues and strategy.	0.80	850.00	\$680.00
04/06/2018	WNL	BL	Analyze issues concerning potential settlement structures, taxes and related issues.	0.80	850.00	\$680.00
04/13/2018	WNL	BL	Confer with A. Friedman re: Court's order on summary judgment motion and related matters.	0.50	850.00	\$425.00
04/13/2018	WNL	BL	Review and analyze Order Granting Summary Judgment avoiding lien based on Section 544	0.80	850.00	\$680.00
04/13/2018	WNL	BL	Review additional correspondence re: Court's order on Motions for Summary Judgment.	0.20	850.00	\$170.00
04/13/2018	WNL	BL	Review and analyze the language of Court's Order on Motions for Summary Judgment.	0.20	850.00	\$170.00
04/13/2018	WNL	BL	Telephone call with A. Friedman re: issues raised by Court's Order Granting Motions for Summary judgment.	0.30	850.00	\$255.00
04/13/2018	WNL	BL	Review correspondence re: settlement issues and strategy	0.20	850.00	\$170.00
04/13/2018	WNL	BL	Analyze possible settlement scenarios and timing issues.	0.40	850.00	\$340.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/17/2018	WNL	BL	Review and analyze correspondence re: issues concerning Court order Granting Motion For Summary Judgment.	0.10	850.00	\$85.00
04/17/2018	NPL	BL	Prepare counsel for status conference regarding Beitler v. Bral adversary matter.	0.10	250.00	\$25.00
04/17/2018	NPL	BL	Prepare counsel for status conference regarding Steward Financial v. Bral adversary matter.	0.10	250.00	\$25.00
04/17/2018	NPL	BL	Prepare counsel for status conference regarding Beitler Real Estate Company v. Bral adversary matter.	0.10	250.00	\$25.00
04/19/2018	WNL	BL	Review draft stipulation re: Court Order granting Motion for Summary Judgment.	0.10	850.00	\$85.00
04/23/2018	WNL	BL	Review correspondence re: draft order on preference stipulation.	0.10	850.00	\$85.00
04/23/2018	WNL	BL	Review and analyze correspondence re: settlement issues.	0.20	850.00	\$170.00
04/23/2018	WNL	BL	Review correspondence and tax returns re: facts needed for settlement negotiations.	0.40	850.00	\$340.00
04/23/2018	WNL	BL	Review J. Bral's comments re: settlement strategy.	0.10	850.00	\$85.00
04/23/2018	WNL	BL	Review additional correspondence re: settlement strategy and timing.	0.20	850.00	\$170.00
04/26/2018	WNL	BL	Review settlement proposal to G. Klausner.	0.10	850.00	\$85.00
				6.10	\$4,865.00	

Case Administration [B110]

04/03/2018	NPL	CA	Review and reply to email from L. Gauthier regarding chapter 11 status report.	0.10	250.00	\$25.00
04/03/2018	NPL	CA	Review chapter 11 status report; create redlined revisions regarding same.	0.60	250.00	\$150.00
04/04/2018	NPL	CA	Review and reply to email from L. Gauthier regarding chapter 11 status report.	0.10	250.00	\$25.00
04/04/2018	NPL	CA	Confer with W. Lobel regarding chapter 11 status report.	0.10	250.00	\$25.00
04/04/2018	WNL	CA	Review, revise and ultimately sign chapter 11 status report and confer with N. Lockwood re: revisions.	0.30	850.00	\$255.00
04/04/2018	WNL	CA	Review latest case status report and related correspondence.	0.10	850.00	\$85.00
04/04/2018	WNL	CA	Conference with A. Friedman and S. O'Keefe re: various pending matters, strategy and action to be taken.	2.50	850.00	\$2,125.00
04/06/2018	NPL	CA	Review and reply to email from L. Gauthier regarding critical date and deadline memorandum; attention to review of same.	0.40	250.00	\$100.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/12/2018	WNL	CA	Review and revise pre-bill for March, 2018.	2.60	850.00	\$2,210.00
04/13/2018	WNL	CA	Review summary of pending deadlines and hearings.	0.10	850.00	\$85.00
04/16/2018	WNL	CA	Review Monthly Operating Report for March, 2018.	0.10	850.00	\$85.00
04/17/2018	NPL	CA	Prepare counsel for chapter 11 status conference.	0.10	250.00	\$25.00
				7.10	\$5,195.00	

Claims Admin/Objections[B310]

04/02/2018	TCF	CO	Research and review of issues regarding motion to dismiss Steward action and claims.	0.30	650.00	\$195.00
04/02/2018	TCF	CO	Correspondence with A. Friedman regarding motion to dismiss Steward action and claims.	0.10	650.00	\$65.00
04/03/2018	WNL	CO	Consider evidence relevant to alleged forgery of initials and related issues.	0.90	850.00	\$765.00
04/03/2018	WNL	CO	Review and analyze pending issues, strategies and alternatives re: objections to claims.	1.70	850.00	\$1,445.00
04/03/2018	TCF	CO	Telephone conference with A. Friedman regarding motion to dismiss Steward action and claims.	0.10	650.00	\$65.00
04/04/2018	SAO	CO	Attend conference with W. Lobel and A. Friedman re case strategy issues relating to two pending arbitrations and upcoming hearing on motion strike claims.	2.00	750.00	\$1,500.00
04/04/2018	SAO	CO	Review documents in file and begin preparation of cross examination script for Betsy Boyd re hearing on motion to strike claims.	1.30	750.00	\$975.00
04/04/2018	WNL	CO	Review correspondence re: action to be taken in preparation for April 18 hearing.	0.20	850.00	\$170.00
04/04/2018	WNL	CO	Review Statement of Beitler creditors re pending hearing on Objections to Claims.	0.10	850.00	\$85.00
04/04/2018	WNL	CO	Review correspondence re: information requested for settlement purposes.	0.20	850.00	\$170.00
04/05/2018	NPL	CO	Review and reply to email from L. Gauthier regarding Beitler Parties responses to crime fraud brief; review same.	0.30	250.00	\$75.00
04/05/2018	NPL	CO	Review and reply to email from W. Lobel regarding responses to crime fraud brief.	0.10	250.00	\$25.00
04/05/2018	NPL	CO	Review email from A. Friedman regarding discovery disputes regarding claim objections Beitler Parties claims.	0.10	250.00	\$25.00
04/05/2018	NPL	CO	Review multiple emails between S. O'Keefe and A. Friedman regarding discovery disputes regarding claim objections to Beitler Parties claims.	0.20	250.00	\$50.00
04/05/2018	NPL	CO	Review and reply to email from A. Friedman	0.20	250.00	\$50.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			regarding transcript to motion to strike; attention to same.			
04/05/2018	NPL	CO	Review and reply to email from A. Friedman regarding issuance of subpoenas for trial on objection to the Beitler Parties claims	0.10	250.00	\$25.00
04/05/2018	NPL	CO	Prepare draft subpoena for Beitler Parties claim objections trial.	0.30	250.00	\$75.00
04/05/2018	NPL	CO	Draft email to A. Friedman, S. O'Keefe, W. Lobel and T. Flanagan regarding trial subpoenas.	0.10	250.00	\$25.00
04/05/2018	NPL	CO	Review email from W. Lobel regarding issuance of subpoenas; draft email to A. Friedman, S. O'Keefe and T. Flanagan regarding same.	0.10	250.00	\$25.00
04/05/2018	NPL	CO	Draft email to A. Friedman regarding issuance of subpoenas; review email from A. Friedman regarding same.	0.10	250.00	\$25.00
04/05/2018	NPL	CO	Prepare trial subpoenas for T. Lallas, G. Klausner, M. Hurwitz and D. Rezak.	0.60	250.00	\$150.00
04/05/2018	NPL	CO	Telephone call with L. Gauthier regarding trial subpoenas.	0.10	250.00	\$25.00
04/05/2018	NPL	CO	Draft email to W. Lobel regarding deposition subpoenas.	0.10	250.00	\$25.00
04/05/2018	NPL	CO	Review email from S. O'Keefe regarding trial subpoenas.	0.10	250.00	\$25.00
04/05/2018	SAO	CO	Review response to crime-fraud brief relating to attorney-client privilege dispute (motion to strike claims).	1.50	750.00	\$1,125.00
04/05/2018	SAO	CO	Respond to emails from A. Friedman re response to Beitler's recent filings.	0.30	750.00	\$225.00
04/05/2018	WNL	CO	Review and analyze Beitler pleadings filed in opposition to brief on crime/ fraud brief.	1.60	850.00	\$1,360.00
04/05/2018	WNL	CO	Telephone call with A. Friedman re: Beitler responses to brief on crime/fraud exception and action to be taken.	0.60	850.00	\$510.00
04/05/2018	WNL	CO	Review correspondence re: witnesses at April 18 hearing.	0.10	850.00	\$85.00
04/05/2018	WNL	CO	Telephone call with G. Klausner and A. Friedman re: notice of required appearances for hearing on April 18.	0.30	850.00	\$255.00
04/05/2018	WNL	CO	Review correspondence and analyze language of Order re: attendance and testimony at April 18 hearing.	0.60	850.00	\$510.00
04/05/2018	WNL	CO	Analyze issues to be decided at April 18 hearing and action to be taken to prepare for hearing.	0.60	850.00	\$510.00
04/05/2018	WNL	CO	Review correspondence re: discovery issues and	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			arguments.			
04/05/2018	WNL	CO	Review correspondence re: need for motion to compel to tee up discovery disputes.	0.20	850.00	\$170.00
04/05/2018	WNL	CO	Review correspondence re: February 21 hearing.	0.20	850.00	\$170.00
04/05/2018	WNL	CO	Review additional correspondence re: technical arguments concerning discovery disputes.	0.20	850.00	\$170.00
04/05/2018	WNL	CO	Review additional correspondence re: discovery disputes.	0.10	850.00	\$85.00
04/05/2018	WNL	CO	Review pleadings filed by B. Beitler and related correspondence re crime/fraud issues and attendance at April 18 hearing.	0.50	850.00	\$425.00
04/05/2018	WNL	CO	Review additional correspondence re: discovery issues.	0.10	850.00	\$85.00
04/05/2018	WNL	CO	Review and analyze brief filed by Barry Beitler re: crime fraud issues.	0.50	850.00	\$425.00
04/05/2018	TCF	CO	Review and analysis of claims issues and calculations.	0.40	650.00	\$260.00
04/06/2018	NPL	CO	Review and reply to email from A. Friedman regarding dates and deadline regarding crime fraud brief.	0.10	250.00	\$25.00
04/06/2018	NPL	CO	Review and reply to email from S. O'Keefe regarding Boyd subpoena and notice.	0.10	250.00	\$25.00
04/06/2018	NPL	CO	Revise and finalize B. Boyd subpoena and notice of subpoena; forward same to S. O'Keefe and A. Friedman for review.	0.40	250.00	\$100.00
04/06/2018	NPL	CO	Confer with L. Gauthier regarding service details for trial subpoenas.	0.10	250.00	\$25.00
04/06/2018	NPL	CO	Confer with W. Lobel regarding final review of subpoenas and notice of subpoenas for T. Lallas, B. Beitler, B. Boyd, M. Hurwitz, D. Rezak and G. Klausner.	0.20	250.00	\$50.00
04/06/2018	NPL	CO	Prepare notices of subpoena for T. Lallas, M. Hurwitz, G. Klausner. Beitler and D. Rezak; forward same to S. O'Keefe and A Friedman for review.	0.90	250.00	\$225.00
04/06/2018	NPL	CO	Revise and finalize subpoenas for T. Lallas, M. Hurwitz, D. Rezak, B. Beitler and G. Klausner.	0.70	250.00	\$175.00
04/06/2018	NPL	CO	Interface with attorney service regarding service of B. Boyd subpoena and notice; review multiple emails regarding same.	0.40	250.00	\$100.00
04/06/2018	NPL	CO	Draft email to A. Friedman, S. O'Keefe and W. Lobel regarding status of service of Boyd subpoena and notice; reply to email regarding same.	0.10	250.00	\$25.00
04/06/2018	NPL	CO	Revise and finalize notices of subpoena for T. Lallas, M. Hurwitz, G. Klausner. Beitler and D.	0.70	250.00	\$175.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Rezak.			
04/06/2018	NPL	CO	Compile subpoenas and notices regarding trial on objections to Beitler Parties claims; prepare same for trial.	0.30	250.00	\$75.00
04/06/2018	SAO	CO	Conference call with A. Friedman re issues relating to hearing on April 18, 2018, and service of subpoenas to compel appearances.	0.20	750.00	\$150.00
04/06/2018	SAO	CO	Prepare reply to opposition to crime fraud brief filed by Beitler Parties.	4.30	750.00	\$3,225.00
04/06/2018	WNL	CO	Review correspondence re: guarantee claims.	0.10	850.00	\$85.00
04/06/2018	WNL	CO	Review correspondence and analyze issues re: payment of guarantee claims.	0.20	850.00	\$170.00
04/06/2018	WNL	CO	Review additional correspondence re: issues concerning claims involved with the properties.	0.20	850.00	\$170.00
04/06/2018	WNL	CO	Review correspondence re: witnesses to be called at the April 18 hearing	0.20	850.00	\$170.00
04/06/2018	WNL	CO	Review correspondence re: compelled attendance at April 18 hearing.	0.10	850.00	\$85.00
04/06/2018	WNL	CO	Review correspondence re: attendance of witnesses at April 18 hrearing.	0.10	850.00	\$85.00
04/06/2018	WNL	CO	Review proposed communication re: attendance at April 18 hearing.	0.10	850.00	\$85.00
04/06/2018	WNL	CO	Analyze cases cited re: crime/fraud exception.	0.90	850.00	\$765.00
04/06/2018	WNL	CO	Review and analyze pleadings and arguments re: applicability of the crime/fraud exception.	0.70	850.00	\$595.00
04/06/2018	WNL	CO	Analyze issues and begin preparation for hearing on April 18.	1.70	850.00	\$1,445.00
04/06/2018	TCF	CO	Various correspondence with team regarding guaranty claims and related issues.	0.20	650.00	\$130.00
04/06/2018	TCF	CO	Review and analysis of claims and valuation issues.	0.50	650.00	\$325.00
04/06/2018	TCF	CO	Telephone conference with A. Friedman regarding contingent guaranty claim issues and issues regarding amendment to disclosure statement.	0.20	650.00	\$130.00
04/06/2018	TCF	CO	Review and analysis of contingent guaranty claim issues.	0.80	650.00	\$520.00
04/07/2018	SAO	CO	Continue drafting reply to opposition to crimefraud brief.	4.40	750.00	\$3,300.00
04/08/2018	SAO	CO	Continue preparation of Reply to opposition to Crime-Fraud brief.	3.20	750.00	\$2,400.00
04/09/2018	NPL	CO	Review email from N. Sun regarding proof of service of Boyd subpoena; review same.	0.20	250.00	\$50.00
04/09/2018	NPL	CO	Telephone call with attorney service regarding	0.20	250.00	\$50.00

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			updated status of service of subpoenas.			
04/09/2018	SAO	CO	Continue preparation of Reply to opposition to Crime-Fraud brief.	3.90	750.00	\$2,925.00
04/09/2018	WNL	CO	Review additional correspondence re: questions concerning fraudulent OPA.	0.10	850.00	\$85.00
04/09/2018	WNL	CO	Review correspondence re: various versions of OPA's.	0.20	850.00	\$170.00
04/09/2018	WNL	CO	Review exemplars of Betsy Boyd's signature and related correspondence.	0.20	850.00	\$170.00
04/09/2018	WNL	CO	Review correspondence re: service of process issues	0.10	850.00	\$85.00
04/09/2018	WNL	CO	Review additional correspondence re: Betsy Boyd's signature.	0.10	850.00	\$85.00
04/09/2018	WNL	CO	Review correspondence re: notice to John Bral to appear at the April 18 hearing.	0.10	850.00	\$85.00
04/09/2018	WNL	CO	Review correspondence re: service of various subpoenas and related correspondence.	0.20	850.00	\$170.00
04/09/2018	WNL	CO	Review correspondence re: scheduling of John Bral's guarantees of Mission and Westcliff debt.	0.10	850.00	\$85.00
04/09/2018	WNL	CO	Review correspondence re: retention of handwriting expert.	0.20	850.00	\$170.00
04/09/2018	WNL	CO	Review and respond to correspondence re: retention of handwriting expert.	0.10	850.00	\$85.00
04/09/2018	WNL	CO	Review correspondence re: retention of professionals.	0.10	850.00	\$85.00
04/09/2018	WNL	CO	Analyze legal and factual issues relevant to objections to claims and defenses thereto.	1.60	850.00	\$1,360.00
04/09/2018	WNL	CO	Review and analyze pleadings and legal and factual issues re: crime/ fraud exception and basis for striking claims.	1.80	850.00	\$1,530.00
04/09/2018	WNL	CO	Review and analyze correspondence re: settlement strategy timing issues.	0.20	850.00	\$170.00
04/09/2018	WNL	CO	Review and analyze issues concerning striking of claims based on fraudulent documents	0.40	850.00	\$340.00
04/09/2018	WNL	CO	Review correspondence re: retention of handwriting expert.	0.10	850.00	\$85.00
04/10/2018	NPL	CO	Review email from A. Friedman regarding statement of Beitler creditors regarding disallowance of claims.	0.10	250.00	\$25.00
04/10/2018	NPL	CO	Review and reply to email from L. Gauthier regarding status of service of subpoenas.	0.10	250.00	\$25.00
04/10/2018	NPL	CO	Review emails from DDS Legal regarding status of service of subpoenas; draft email to DDS Legal regarding same.	0.30	250.00	\$75.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/10/2018	NPL	CO	Review status of service of subpoenas; interface with attorney service regarding same.	0.30	250.00	\$75.00
04/10/2018	NPL	CO	Review and reply to email from A. Friedman regarding declaration of W. Lobel.	0.10	250.00	\$25.00
04/10/2018	NPL	CO	Review and reply to email from L. Gauthier regarding notice of intent to call witness for oral testimony.	0.10	250.00	\$25.00
04/10/2018	NPL	CO	Revise notice of intent to call witnesses for oral testimony.	0.20	250.00	\$50.00
04/10/2018	NPL	CO	Begin preparation of declaration of W. Lobel regarding service of subpoenas.	0.30	250.00	\$75.00
04/10/2018	NPL	CO	Review email from G. Pemberton regarding reply to Beitler statement.	0.10	250.00	\$25.00
04/10/2018	NPL	CO	Review email from A. Friedman regarding exhibit to reply to Beitler statement; review exhibit regarding same.	0.20	250.00	\$50.00
04/10/2018	NPL	CO	Review emails from attorney service regarding updated status of service of subpoenas.	0.20	250.00	\$50.00
04/10/2018	SAO	CO	Revise and finalize draft of Reply to Opposition to Crime-Fraud brief.	5.50	750.00	\$4,125.00
04/10/2018	WNL	CO	Review correspondence re:service of subpoenas.	0.10	850.00	\$85.00
04/10/2018	WNL	CO	Telephone call with A. Friedman re: pending hearing on 4/18 and related issues.	0.40	850.00	\$340.00
04/10/2018	WNL	CO	review, analyze and comment on draft Reply to opposition to Crime/Fraud Brief.	1.10	850.00	\$935.00
04/10/2018	WNL	CO	Review and respond to comments to the draft Reply.	0.20	850.00	\$170.00
04/10/2018	WNL	CO	Review and analyze draft Reply to Beitler Parties Statement re: hearing scheduled for April 18.	0.40	850.00	\$340.00
04/10/2018	WNL	CO	Review correspondence and comments on draft of Reply to Beitler Statement re: April 18 hearing.	0.30	850.00	\$255.00
04/10/2018	WNL	CO	Review correspondence re: logistics of responding to pending pleadings.	0.10	850.00	\$85.00
04/10/2018	WNL	CO	Review correspondence re: pending April 18 hearing.	0.10	850.00	\$85.00
04/10/2018	WNL	CO	Review correspondence re: service of subpoenas.	0.10	850.00	\$85.00
04/10/2018	WNL	CO	Review correspondence re: alleged need for motion to compel at the April 18 hearing and analyze issue.	0.20	850.00	\$170.00
04/10/2018	WNL	CO	Review and analyze issues to be the subject of the April 18 hearing	0.80	850.00	\$680.00
04/10/2018	WNL	CO	Review correspondence re: relevant legal issues.	0.40	850.00	\$340.00
04/10/2018	TCF	CO	Correspondence L. Gauthier regarding open claim issues.	0.10	650.00	\$65.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/10/2018	TCF	CO	Correspondence L. Gauthier regarding security documents.	0.10	650.00	\$65.00
04/10/2018	TCF	CO	Correspondence L. Gauthier regarding bar date.	0.10	650.00	\$65.00
04/11/2018	WNL	CO	Confer with N. Lockwood and review correspondence re: contents of W. Lobel Declaration.	0.20	850.00	\$170.00
04/11/2018	NPL	CO	Review and reply to email from L. Gauthier regarding request for judicial notice regarding debtor's reply to statement of Beitler Creditors regarding disallowance of claims 14 and 16.	0.10	250.00	\$25.00
04/11/2018	NPL	CO	Telephone call with L. Gauthier regarding request for judicial regarding debtor's reply to statement of Beitler Creditors regarding disallowance of claims 14 and 16.	0.10	250.00	\$25.00
04/11/2018	NPL	CO	Review emails from S. O'Keefe, G. Pemberton and A. Friedman regarding debtor's reply to statement of Beitler Creditors regarding disallowance of claims 14 and 16 and reply statement to crime-fraud brief.	0.20	250.00	\$50.00
04/11/2018	NPL	CO	Review and reply to email from L. Gauthier regarding pleadings regarding debtor's reply to statement of Beitler Creditors regarding disallowance of claims 14 and 16 and reply to response to crime-fraud brief.	0.10	250.00	\$25.00
04/11/2018	NPL	CO	Review emails from DDS Legal regarding service of notice of subpoenas and subpoenas on Klausner, Hurwitz and Lallas.	0.40	250.00	\$100.00
04/11/2018	NPL	CO	Draft email to A. Friedman regarding service of notice of subpoenas and subpoenas on Klausner, Lallas ad Hurwitz; review and reply to email from A. Friedman regarding same.	0.20	250.00	\$50.00
04/11/2018	NPL	CO	Confer with W. Lobel regarding email communications with G. Klausner and T. Lallas regarding debtor's reply to statement of Beitler Creditors regarding disallowance of claims 14 and 16.	0.10	250.00	\$25.00
04/11/2018	NPL	CO	Draft emails to DDS Legal regarding proofs of service for Beitler and Ruzak.	0.10	250.00	\$25.00
04/11/2018	NPL	CO	Review and reply to email from A. Friedman regarding notice of intent to call witnesses.	0.10	250.00	\$25.00
04/11/2018	NPL	CO	Revise notice of intent to call witnesses at hearing on claim objections to Beitler's claim 14 and 16.	0.50	250.00	\$125.00
04/11/2018	NPL	CO	Draft declaration of W. Lobel regarding service of subpoenas on Lallas, Klausner, Beitler, Ruzak, Boyd and Hurwitz.	0.80	250.00	\$200.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/11/2018	NPL	CO	Draft email to A. Friedman, S. O'Keefe, G. Pemberton and W. Lobel regarding declaration of W. Lobel.	0.10	250.00	\$25.00
04/11/2018	NPL	CO	Review and reply to email from L. Gauthier regarding exhibit to reply to Beitler statement.	0.10	250.00	\$25.00
04/11/2018	NPL	CO	Review and reply to email from L. Gauthier regarding updated pleadings and exhibits to reply to Beitler statement and reply to Beitler's response to crime-fraud brief.	0.20	250.00	\$50.00
04/11/2018	NPL	CO	Draft email to A. Friedman regarding exhibits to declaration of W. Lobel.	0.10	250.00	\$25.00
04/11/2018	NPL	CO	Review and reply to email from attorney service regarding proofs of service for Beitler and Ruzek.	0.10	250.00	\$25.00
04/11/2018	NPL	CO	Revise and finalize declaration of W. Lobel regarding notice of intent to call witnesses for oral testimony.	0.70	250.00	\$175.00
04/11/2018	NPL	CO	Revise and finalize reply to Beitler Statement.	1.10	250.00	\$275.00
04/11/2018	NPL	CO	Finalize request for judicial notice regarding reply to Beitler statement	0.40	250.00	\$100.00
04/11/2018	NPL	CO	Finalize notice of intent to take oral testimony at April 18, 2018 hearing.	0.50	250.00	\$125.00
04/11/2018	NPL	CO	Revise and finalize reply to response to crime-fraud brief.	0.90	250.00	\$225.00
04/11/2018	NPL	CO	Telephone call with L. Gauthier regarding Beitler statement and reply to response to crime fraud brief.	0.20	250.00	\$50.00
04/11/2018	SAO	CO	Additional revisions to reply re opposition of Beitler Parties to brief re application of crime-fraud exception to privileges claimed by Beitler Parties.	1.20	750.00	\$900.00
04/11/2018	SAO	CO	Review and revise draft reply to opposition to crime-fraud brief.	3.90	750.00	\$2,925.00
04/11/2018	WNL	CO	Review correspondence re: revision of Brief on Crime/Fraud exception.	0.20	850.00	\$170.00
04/11/2018	WNL	CO	Review and analyze revised version of Brief on Crime/Fraud exception.	0.60	850.00	\$510.00
04/11/2018	WNL	CO	Review correspondence re: revisions to Brief on Crime/Fraud ezception.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review and analyze additional correspondence re: arguments in the Brief on Crime/Fraud exception.	0.20	850.00	\$170.00
04/11/2018	WNL	CO	Review latest iteration of Reply to Opposition to Motion to Strike Claims.	0.40	850.00	\$340.00
04/11/2018	WNL	CO	Review additional correspondence re: changes to Reply re: Crime/Fraud Broef.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Telephone conference with A. Friedman re:	0.30	850.00	\$255.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			comments on final version of Reply re: Brief on Crime/Fraud exception.			
04/11/2018	WNL	CO	Review final version of Reply re: Crime/fraud exception.	0.50	850.00	\$425.00
04/11/2018	WNL	CO	Review correspondence re: exhibits to Reply.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review additional correspondence re: changes to reply.	0.20	850.00	\$170.00
04/11/2018	WNL	CO	Review draft Notice of Intent to Call Witnesses.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review Notice of Request to Call Witnesses at April 18 hearing.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review and add language to Declaration of W. Lobel in Support of Reply.	0.20	850.00	\$170.00
04/11/2018	WNL	CO	Review final version of Reply re: Beitler Parties Statement re: April 18 hearing.	0.40	850.00	\$340.00
04/11/2018	WNL	CO	Review correspondence re: additional information to be included in the Declaration of W. Lobel.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Confer with N' Lockwood and review correspondence re: pleadings and documents to be filed with the Court.	0.20	850.00	\$170.00
04/11/2018	WNL	CO	Review correspondence re: language to be included in W. lobel Declaration.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review Notice re: status of service and service attempts re witnesses to appear on April 18.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review final version of Reply, ready to be filed.	0.40	850.00	\$340.00
04/11/2018	WNL	CO	Review ready to be filed version of Reply to response to Brief on Crime/Fraud exception.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review correspondence re: pleadings to be filed in connection with hearing on April 18.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review exhibits to Declaration of W. Lobel.	0.30	850.00	\$255.00
04/11/2018	WNL	CO	Review and analyze arguments re: use of altered OPA and related correspondence.	0.20	850.00	\$170.00
04/11/2018	WNL	CO	Review correspondence re: language of W. Lobel declaration.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review correspondence re: final review of Reply.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review correspondence re: issues with exhibits to Reply re: Beitler Statement re: Discovery.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review draft Reply to Beitler's Opposition to Motion to Strike Claims.	0.20	850.00	\$170.00
04/11/2018	WNL	CO	Review correspondence re: managing director arguments.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review A. Friedman's changes to Reply re: Crime/Fraud exception.	0.40	850.00	\$340.00

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04/11/2018	WNL	CO	Review comments to Reply to Beitler's Statement re: Discovery.	0.20	850.00	\$170.00
04/11/2018	WNL	CO	Review correspondence re: arguments made in Reply re: Brief on Crime/Fraud exception.	0.20	850.00	\$170.00
04/11/2018	WNL	CO	Review correspondence re: conduct of hearing on April 18	0.30	850.00	\$255.00
04/11/2018	WNL	CO	Review request for judicial notice and related correspondence.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review correspondence re: pleadings to be filed.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review correspondence re: preparation for hearing on April 18.	0.20	850.00	\$170.00
04/11/2018	WNL	CO	Review correspondence re: revision of various pleadings.	0.20	850.00	\$170.00
04/11/2018	WNL	CO	Review correspondence re: service of subpoenas on potential witnesses for the April 18 hearing.	0.10	850.00	\$85.00
04/11/2018	WNL	CO	Review correspondence re: request for judicial notice.	0.10	850.00	\$85.00
04/12/2018	WNL	CO	Analyze various facts concerning alleged fraud and related issues.	0.40	850.00	\$340.00
04/12/2018	SAO	CO	Prepare cross examination scripts for 4/18/2018 hearing.	2.10	750.00	\$1,575.00
04/12/2018	WNL	CO	Review correspondence re: service on individuals to compel attendance at April 18 hearing.	0.30	850.00	\$255.00
04/12/2018	WNL	CO	Review and analyze order re: motion for summary judgment.	0.20	850.00	\$170.00
04/12/2018	WNL	CO	Review correspondence re: service on potential witnesses for April 18.	0.20	850.00	\$170.00
04/12/2018	WNL	CO	Review correspondence re: preparation for April 18 hearing.	0.40	850.00	\$340.00
04/12/2018	WNL	CO	Review correspondence re: retention of experts for pending litigation.	0.20	850.00	\$170.00
04/13/2018	WNL	CO	Review legal issues and arguments re: crime/fraud argument.	0.70	850.00	\$595.00
04/13/2018	SAO	CO	Draft cross-examination scripts for examination of Boyd and Beitler at hearing set for 4/18/2018.	4.20	750.00	\$3,150.00
04/13/2018	SAO	CO	Prepare visual exhibits for use in cross examination of Beitler and Boyd in upcoming 4/18/2018 hearing.	1.20	750.00	\$900.00
04/13/2018	WNL	CO	Review and analyze pleadings and documents in preparation for April 18 hearing.	1.40	850.00	\$1,190.00
04/13/2018	WNL	CO	Analyze settlement possibilities and develop strategy.	0.30	850.00	\$255.00
04/14/2018	SAO	CO	Review and revise cross examination script re Betsy	0.50	750.00	\$375.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Boyd for 4/18 hearing on motion to strike claims.			
04/16/2018	NPL	CO	Review and reply to email from L. Gauthier regarding hearing on motion to disallow Beitler Parties claims.	0.10	250.00	\$25.00
04/16/2018	SAO	CO	Attending meeting with A. Friedman and W. Lobel re preparation for hearing on 4/18/2018 re application of crime-fraud exception to privilege.	2.30	750.00	\$1,725.00
04/16/2018	SAO	CO	Finalize Betsy Boyd's cross examination script re 4/18/2018 hearing.	1.00	750.00	\$750.00
04/16/2018	NPL	CO	Prepare A. Friedman and W. Lobel for meeting with J. Bral regarding hearing on disallowance of Beitler Parties claims.	0.40	250.00	\$100.00
04/16/2018	WNL	CO	Review and analyze draft examination of Betsy Boyd and suggest additional questions.	0.40	850.00	\$340.00
04/16/2018	WNL	CO	Prepare for and meet with A. Friedman, S. O'Keefe and J. Bral re: pending hearing on April 18, and related issues.	2.70	850.00	\$2,295.00
04/16/2018	WNL	CO	Review and analyze results of research Re; exclusion of witnesses at trial.	0.20	850.00	\$170.00
04/16/2018	WNL	CO	Review additional correspondence re: exclusion of potential witnesses.	0.10	850.00	\$85.00
04/16/2018	WNL	CO	Review correspondence re: preparation for April 18 hearing.	0.10	850.00	\$85.00
04/16/2018	WNL	CO	Review and analyze draft examination of Betsy Boyd.	0.20	850.00	\$170.00
04/17/2018	NPL	CO	Prepare counsel for hearing on motion to disallow claims of the Beitler Parties.	2.60	250.00	\$650.00
04/17/2018	NPL	CO	Review order requiring appearances of T. Lallas, G. Klausner and M. Hurwitz.	0.10	250.00	\$25.00
04/17/2018	SAO	CO	Draft Barry Beitler's cross examination script re hearing on motion strike claims.	4.40	750.00	\$3,300.00
04/17/2018	SAO	CO	Review documents in file and prepare witness exhibits and potential rebuttal exhibits in preparation for hearing on application of crime fraud exception within context of motion to strike proofs of claim 14 and 16.	3.50	750.00	\$2,625.00
04/17/2018	WNL	CO	Review Court Order on live testimony at April 18 hearing.	0.10	850.00	\$85.00
04/17/2018	WNL	CO	Review and respond to correspondence re: attendance at April 18 hearing.	0.10	850.00	\$85.00
04/17/2018	WNL	CO	Review additional correspondence re: attendance at April 18 hearing.	0.10	850.00	\$85.00
04/17/2018	WNL	CO	Telephone call with A. Friedman re: discovery and related issues.	0.30	850.00	\$255.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/17/2018	WNL	CO	Review pleadings and prepare arguments for April 18 hearing.	1.90	850.00	\$1,615.00
04/17/2018	TCF	CO	Correspond with A. Friedman regarding Steward claim issues; review and analysis of same.	0.30	650.00	\$195.00
04/17/2018	TCF	CO	Telephone conference with A. Friedman regarding Steward claim issues.	0.20	650.00	\$130.00
04/18/2018	NPL	CO	Review and reply to emails from attorney service regarding updated service of subpoenas for Klausner, Lallas and Hurwitz.	0.20	250.00	\$50.00
04/18/2018	NPL	CO	Draft email to A. Friedman, W. Lobel and S. O'Keefe regarding updated service for Klausner, Lallas and Hurwitz.	0.10	250.00	\$25.00
04/18/2018	NPL	CO	Prepare W. Lobel for hearing on disallowance of Beitler Parties proofs of claim.	0.40	250.00	\$100.00
04/18/2018	NPL	CO	Confer with L. Gauthier regarding hearing on crime fraud brief.	0.10	250.00	\$25.00
04/18/2018	NPL	CO	Confer with W. Lobel regarding hearing on crime-fraud brief.	0.10	250.00	\$25.00
04/18/2018	SAO	CO	Attend hearing on issues relating to application of crime-fraud exception to attorney client privilege within context of motion to strike proofs of claim 14 and 16.	6.50	750.00	\$4,875.00
04/18/2018	SAO	CO	Prepare for hearing on whether or not crime fraud exception applies set for 4/18/2018.	3.90	750.00	\$2,925.00
04/18/2018	WNL	CO	Review and analyze relevant documents and pleadings in preparation for hearing on discovery disputes.	2.80	850.00	\$2,380.00
04/18/2018	WNL	CO	Attendance at hearing on discovery disputes.	6.30	850.00	\$5,355.00
04/18/2018	WNL	CO	Review correspondence re: discovery issues.	0.10	850.00	\$85.00
04/18/2018	WNL	CO	Review correspondence re:additional discovery issues.	0.10	850.00	\$85.00
04/19/2018	NPL	CO	Confer with W. Lobel regarding status of hearing on disallowance of Beitler Creditors proofs of claim.	0.10	250.00	\$25.00
04/19/2018	NPL	CO	Confer with L. Gauthier regarding dates and deadlines associated with the hearing on disallowance of Beitler Parties proofs of claim.	0.10	250.00	\$25.00
04/19/2018	NPL	CO	Review and reply to email from A. Friedman regarding transcript for hearing on motion for disallowance of Beitler Parties proofs of claim.	0.10	250.00	\$25.00
04/19/2018	NPL	CO	Draft email to H. Martens of Briggs reporting regarding transcript for hearing on motion for disallowance of Beitler Parties proofs of claim; review and reply to multiple emails from H. Martens regarding same.	0.20	250.00	\$50.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/19/2018	NPL	CO	Confer with J. O'Keefe regarding handwriting expert; review multiple emails regarding same.	0.10	250.00	\$25.00
04/19/2018	SAO	CO	Conference call with A. Friedman re strategy for resolving privilege issues in connection with motion to strike.	0.40	750.00	\$300.00
04/19/2018	WNL	CO	Review correspondence re: transcript of April 18 hearing.	0.10	850.00	\$85.00
04/19/2018	WNL	CO	Telephone call with A. Friedman re: strategy and issues concerning claims objections.	0.30	850.00	\$255.00
04/19/2018	WNL	CO	Review correspondence re: retention of handwriting expert.	0.10	850.00	\$85.00
04/19/2018	WNL	CO	Review correspondence re: engagement of handwriting expert.	0.10	850.00	\$85.00
04/19/2018	WNL	CO	Review and respond to draft of e-mail to Tom Lallas re: discovery issues.	0.30	850.00	\$255.00
04/19/2018	WNL	CO	Review correspondence re: handwriting expert and related issues.	0.10	850.00	\$85.00
04/19/2018	WNL	CO	Review correspondence re issues with Beitler parties privilege logs.	0.10	850.00	\$85.00
04/19/2018	WNL	CO	Analyze possible settlement scenarios and pros and cons of each.	0.70	850.00	\$595.00
04/19/2018	WNL	CO	Review documents relevant to fraud issues.	0.50	850.00	\$425.00
04/19/2018	WNL	CO	review correspondence re: handwriting and fraud issues.	0.30	850.00	\$255.00
04/19/2018	WNL	CO	Analyze issues re: identity of perpetrator of fraud.	0.40	850.00	\$340.00
04/20/2018	SAO	CO	Conference call with A. Friedman re employment of second handwriting expert to address issues relating to motion to strike claims.	0.40	750.00	\$300.00
04/20/2018	WNL	CO	Review supplement to schedules to add creditors.	0.10	850.00	\$85.00
04/20/2018	WNL	CO	Review and analyze correspondence re: failure to comply with discovery rules.	0.10	850.00	\$85.00
04/20/2018	WNL	CO	Telephone call with A. Friedman re: discovery and overall strategy issues.	0.40	850.00	\$340.00
04/20/2018	WNL	CO	Telephone call with A. Friedman and S. O'Keefe re: discovery and trial strategy issues.	1.40	850.00	\$1,190.00
04/20/2018	WNL	CO	Review, analyze and respond to summary of settlement issues and analysis.	0.30	850.00	\$255.00
04/20/2018	WNL	CO	Analyze legal and factual issues re: potential settlement proposal.	0.60	850.00	\$510.00
04/20/2018	WNL	CO	Review issues and evidence re: evidentiary issues.	0.70	850.00	\$595.00
04/20/2018	WNL	CO	Review correspondence re: strategy and settlement issues.	0.30	850.00	\$255.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/23/2018	SAO	CO	Review discovery dispute issues in meet and confer letter with A.Friedman.	0.30	750.00	\$225.00
04/23/2018	WNL	CO	Review and analyze correspondence and issues re: global settlement proposal.	0.50	850.00	\$425.00
04/23/2018	WNL	CO	Review and respond to correspondence re: settlement negotiations and timing issues.	0.10	850.00	\$85.00
04/23/2018	WNL	CO	Review Motion to Set Supplemental Bar Date.	0.10	850.00	\$85.00
04/23/2018	WNL	CO	Review recitation of pending discovery disputes.	0.20	850.00	\$170.00
04/23/2018	WNL	CO	Review correspondence re: e-mail to Betsy Boyd.	0.10	850.00	\$85.00
04/23/2018	WNL	CO	Review comments to recitation of pending discovery disputes.	0.10	850.00	\$85.00
04/24/2018	NPL	CO	Review and reply to email from L. Gauthier regarding transcript from hearing on motion to disallow claims.	0.10	250.00	\$25.00
04/24/2018	NPL	CO	Draft email to Brigg Reporting regarding transcript request on hearing on motion for disallowance of Beitler Parites claims.	0.10	250.00	\$25.00
04/24/2018	SAO	CO	Conference call with W. Lobel and A. Friedman re handwriting expert's testimony and preparation of summation on application of crime-fraud exception within context of motion to strike claims.	0.60	750.00	\$450.00
04/24/2018	WNL	CO	Confer with A. Friedman re: action to be taken and strategy concerning falsified documents.	0.80	850.00	\$680.00
04/24/2018	WNL	CO	Review Declaration of A. Friedman re: submission of privilege logs.	0.10	850.00	\$85.00
04/24/2018	WNL	CO	Review final version of Stipulation Regarding Order Granting Debtor's Motion For Summary Judgment.	0.10	850.00	\$85.00
04/24/2018	WNL	CO	Review correspondence re: re: analysis of handwriting initials.	0.10	850.00	\$85.00
04/24/2018	WNL	CO	Review correspondence re: remaining discovery issues.	0.20	850.00	\$170.00
04/24/2018	WNL	CO	Review correspondence and initials re: forgery of initials on falsified Operating Agreement.	0.20	850.00	\$170.00
04/24/2018	WNL	CO	Telephone conference with A. Friedman and S. O'Keefe re: strategy in dealing with forged initials.	0.80	850.00	\$680.00
04/24/2018	WNL	CO	Review correspondence re: results of hearing on Motion to Strike Proofs of Claim.	0.20	850.00	\$170.00
04/24/2018	WNL	CO	Review correspondence re: perjury committed by Bary Beitler at hearing.	0.10	850.00	\$85.00
04/24/2018	WNL	CO	Review correspondence re: Court's tentative and closing arguments.	0.10	850.00	\$85.00
04/24/2018	WNL	CO	Review correspondence re: Court's tentative and results of hearing on crime fraud exception.	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/24/2018	WNL	CO	Review correspondence re: handwriting expert.	0.10	850.00	\$85.00
04/24/2018	TCF	CO	Research and analysis regarding claim issues and estimation.	3.60	650.00	\$2,340.00
04/24/2018	TCF	CO	Drafting regarding claims issues and estimation.	3.20	650.00	\$2,080.00
04/25/2018	SAO	CO	Prepare letter and exhibits to handwriting expert explaining assignment re motion to strike claims.	1.60	750.00	\$1,200.00
04/25/2018	WNL	CO	Review correspondence re: language of e-mail to G. Klausner re: settlement proposal.	0.20	850.00	\$170.00
04/25/2018	WNL	CO	Review proposed letter to handwriting expert re: scope of opinion requested.	0.10	850.00	\$85.00
04/25/2018	WNL	CO	Review additional correspondence re: settlement proposal.	0.10	850.00	\$85.00
04/25/2018	WNL	CO	Review correspondence re: meet and confer re: pending discovery dispute.	0.10	850.00	\$85.00
04/25/2018	WNL	CO	Telephone call with A. Friedman re: various pending issues.	0.30	850.00	\$255.00
04/25/2018	WNL	CO	Review correspondence re: Betsy Boyd's knowledge of claim for improper capital account.	0.10	850.00	\$85.00
04/25/2018	WNL	CO	Review correspondence re: review of initials by handwriting expert.	0.20	850.00	\$170.00
04/25/2018	WNL	CO	Review filed versions of objections to various Betler related Claims.	0.80	850.00	\$680.00
04/25/2018	WNL	CO	Review additional correspondence re: claims objections.	0.10	850.00	\$85.00
04/25/2018	TCF	CO	Telephone conference with P. Lacy of Force 10 Partners regarding claims issues.	0.40	650.00	\$260.00
04/26/2018	SAO	CO	Review transcript and evidence and begin preparation of closing statement on application of crime-fraud exception.	4.60	750.00	\$3,450.00
04/26/2018	WNL	CO	Review correspondence re: retention of handwriting expert.	0.10	850.00	\$85.00
04/26/2018	TCF	CO	Research and analysis regarding lien issues.	0.20	650.00	\$130.00
04/26/2018	TCF	CO	Research and analysis regarding claim related issues.	0.60	650.00	\$390.00
04/27/2018	SAO	CO	Continue reviewing evidence and preparing draft of closing statement re crime-fraud privilege issues.	4.70	750.00	\$3,525.00
04/27/2018	WNL	CO	Review Order setting supplemental bar date.	0.10	850.00	\$85.00
04/27/2018	WNL	CO	Review draft of closing argument and analyze issues and arguments.	0.80	850.00	\$680.00
04/27/2018	WNL	CO	Review additional correspondence re: claims objections.	0.20	850.00	\$170.00
04/27/2018	WNL	CO	Review correspondence re: objection to claim #18.	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/27/2018	WNL	CO	Review correspondence re: objections to Steward claims.	0.10	850.00	\$85.00
04/27/2018	TCF	CO	Review and analysis of Steward claim and objection issues.	0.30	650.00	\$195.00
04/28/2018	TCF	CO	Review and analysis of claims analysis; communications with financial advisor regarding same.	0.40	650.00	\$260.00
04/28/2018	TCF	CO	Review and analysis of guaranty and contingent claim related issues, set-off; correspondence regarding same..	0.80	650.00	\$520.00
04/30/2018	SAO	CO	Conference call with A. Friedman and G. Pemberton re additional ESI discovery requests needed in context of motion to strike claims and discussion of what else is needed to prepare for hearing on motion to strike claims.	0.50	750.00	\$375.00
04/30/2018	SAO	CO	Conference call with counsel for Beitler re discovery disputes relating to motion to strike claims.	0.50	750.00	\$375.00
04/30/2018	WNL	CO	Telephone call with A. Friedman re: closing argument and related issues.	0.10	850.00	\$85.00
04/30/2018	WNL	CO	Telephone call with Frank Hicks and draft correspondence to A. Friedman re: handwriting analysis.	0.10	850.00	\$85.00
04/30/2018	WNL	CO	Conference call re: discovery disputes (meet and confer).(NO CHARGE)	0.40	0.00	\$0.00
				174.10		\$125,035.00

Employment of Professionals

04/05/2018	NPL	EMP	Review emails from S. Pfyl of BBG Appraisal regarding engagement agreement.	0.10	250.00	\$25.00
04/05/2018	NPL	EMP	Review email from J. Bral regarding employment of BBG as appraiser.	0.10	250.00	\$25.00
04/05/2018	NPL	EMP	Draft email to A. Friedman regarding employment of BBG as appraiser.	0.10	250.00	\$25.00
04/10/2018	NPL	EMP	Review email from A. Friedman regarding retention of appraiser.	0.10	250.00	\$25.00
04/10/2018	NPL	EMP	Confer with W. Lobel regarding retention of appraiser.	0.10	250.00	\$25.00
04/11/2018	NPL	EMP	Review entered order employing Shulman Hodges & Bastian as debtor's insolvency counsel.	0.10	250.00	\$25.00
04/11/2018	NPL	EMP	Review and reply to email from L. Gauthier regarding order granting Shulman Hodges & Bastian's employment application.	0.10	250.00	\$25.00
04/11/2018	WNL	EMP	Review correspondence re: engagement of	0.10	850.00	\$85.00

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			appraisers.			
04/24/2018	NPL	EMP	Review application to employ Force Ten; attention to dates and deadlines regarding same.	0.10	250.00	\$25.00
04/24/2018	WNL	EMP	Review application to employ Force 10 Partners as financial advisor and expert witness for the Debtor.	0.40	850.00	\$340.00
04/24/2018	WNL	EMP	Review correspondence re: draft declaration of Adam Meislak.	0.10	850.00	\$85.00
04/24/2018	WNL	EMP	Review application to employ Force 10 as financial advisor.	0.20	850.00	\$170.00
				1.60	\$880.00	

Fees of Professionals

04/26/2018	NPL	FP	Review and reply to email from L. Gauthier regarding professional fees; attention to same.	0.30	250.00	\$75.00
04/26/2018	NPL	FP	Confer with W. Lobel regarding professional fees.	0.10	250.00	\$25.00
				0.40	\$100.00	

Litigation (Non-Bankruptcy)

04/02/2018	NPL	LN	Review email from A. Friedman regarding pending arbitration.	0.10	250.00	\$25.00
04/02/2018	WNL	LN	Review and analyze correspondence re: strategy concerning pending arbitrations.	0.40	850.00	\$340.00
04/04/2018	WNL	LN	Review correspondence re: deposition of Sargent.	0.10	850.00	\$85.00
04/04/2018	WNL	LN	Review status reports re: pending state court litigation.	0.10	850.00	\$85.00
04/04/2018	WNL	LN	Review correspondence re:deposition and testimony of Bob Sargeant.	0.40	850.00	\$340.00
04/04/2018	WNL	LN	Review status report in Stewart Financial.	0.10	850.00	\$85.00
04/04/2018	WNL	LN	Review status report filed by Barry Beitler.	0.10	850.00	\$85.00
04/04/2018	WNL	LN	Review correspondence re: communicated to Judge in Westcliff arbitration.	0.20	850.00	\$170.00
04/04/2018	WNL	LN	Review additional correspondence re: Mission arbitration.	0.10	850.00	\$85.00
04/04/2018	WNL	LN	Review correspondence with JAMS.	0.10	850.00	\$85.00
04/05/2018	WNL	LN	Review and analyze issues concerning Beitler perspective on pending issues and potential settlement proposals.	1.90	850.00	\$1,615.00
04/05/2018	WNL	LN	Review correspondence re: pending arbitrations.	0.10	850.00	\$85.00
04/05/2018	WNL	LN	Review correspondence from arbitrator in Westcliff arbitration.	0.10	850.00	\$85.00

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04/06/2018	WNL	LN	Review correspondence re: need for new appraisals.	0.10	850.00	\$85.00
04/06/2018	WNL	LN	Review proposed engagement letter with appraisers.	0.10	850.00	\$85.00
04/06/2018	WNL	LN	Review correspondence and analyze issues re: discovery disputes.	0.70	850.00	\$595.00
04/10/2018	WNL	LN	Review correspondence re: leases and appraisals for various properties.	0.10	850.00	\$85.00
04/10/2018	WNL	LN	Review additional documents being forwarded in response to discovery requests.	0.20	850.00	\$170.00
04/10/2018	WNL	LN	Review additional leases being produced.	0.50	850.00	\$425.00
04/10/2018	WNL	LN	Review exhibit to Reply to Beitler Statement on Discovery.	0.20	850.00	\$170.00
04/10/2018	WNL	LN	review correspondence re: appraisal of Bakersfield properties.	0.10	850.00	\$85.00
04/10/2018	WNL	LN	Review additional correspondence re: appraisal of Bakersfield properties.	0.10	850.00	\$85.00
04/10/2018	WNL	LN	Review and analyze amended leases for Bakersfield and Westcliff properties.	0.20	850.00	\$170.00
04/10/2018	WNL	LN	Review correspondence re: additional information concerning Westcliff property.	0.20	850.00	\$170.00
04/10/2018	WNL	LN	Review correspondence re: engagement of appraisers.	0.10	850.00	\$85.00
04/10/2018	WNL	LN	Review appraisal of Westcliff property.	0.40	850.00	\$340.00
04/10/2018	WNL	LN	Review information re: valuation of Eye Street property.	0.40	850.00	\$340.00
04/10/2018	WNL	LN	Review additional correspondence re: information concerning value of Eye Street and Westcliff properties.	0.10	850.00	\$85.00
04/10/2018	WNL	LN	Review additional correspondence re: retention of appraisers	0.10	850.00	\$85.00
04/11/2018	NPL	LN	Review electronic notice regarding telephone conference regarding Bral v. Westcliff arbitration; attention to dates and deadlines regarding same.	0.10	250.00	\$25.00
04/11/2018	WNL	LN	Review correspondence re: Westcliff arbitration.	0.10	850.00	\$85.00
04/17/2018	WNL	LN	Review correspondence re: status of writ in favor of Steward.	0.10	850.00	\$85.00
04/17/2018	WNL	LN	Review correspondence re: writ of attachment on Sandpiper property.	0.10	850.00	\$85.00
04/19/2018	WNL	LN	Review correspondence and related pleadings re: writ issues in favor of Steward Financial.	0.40	850.00	\$340.00
04/25/2018	SAO	LN	Review draft settlement letter and provide comments.	0.10	750.00	\$75.00

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04/27/2018	WNL	LN	Review Complaint filed by Cannae in connection with Mineral King property.	0.20	850.00	\$170.00
04/30/2018	SAO	LN	Draft memo to J. Bral re spreadsheet and documentary evidence needed to support capital account claims re Westcliff and Mission LLCs.	0.40	750.00	\$300.00
04/30/2018	WNL	LN	Review appellant's status report on appeal.	0.10	850.00	\$85.00
					<u>9.00</u>	<u>\$7,480.00</u>

Plan & Disclosure Stmt. [B320]

04/02/2018	WNL	PD	Analyze issues re: structure of plan.	0.30	850.00	\$255.00
04/02/2018	WNL	PD	Review and analyze additional plan issues.	0.30	850.00	\$255.00
04/03/2018	WNL	PD	Review and analyze plan issues and structures and alternative structures to resolve issues.	1.40	850.00	\$1,190.00
04/03/2018	TCF	PD	Telephone conference with A. Friedman regarding amended plan and disclosure statement..	0.10	650.00	\$65.00
04/03/2018	TCF	PD	Review and analysis of Court's scheduling order regarding plan and disclosure, evidentiary requirements and related matters.	0.10	650.00	\$65.00
04/03/2018	TCF	PD	Correspondence with A. Friedman regarding Court's scheduling order regarding plan and disclosure, evidentiary requirements and related matters.	0.10	650.00	\$65.00
04/03/2018	TCF	PD	Correspondence with L. Gauthier regarding Court's scheduling order regarding plan and disclosure, and information needed.	0.10	650.00	\$65.00
04/03/2018	TCF	PD	Review and analysis of plan and disclosure, information needed in connection with preparation of amended plan and disclosure statement.	0.60	650.00	\$390.00
04/03/2018	NPL	PD	Review notice of clarification regarding filing of debtor's amended disclosure statement and plan.	0.10	250.00	\$25.00
04/04/2018	WNL	PD	Review correspondence and Request for Clarification of Order.	0.20	850.00	\$170.00
04/04/2018	WNL	PD	Review correspondence re: supplemental information to be included in Disclosure Statement.	0.10	850.00	\$85.00
04/04/2018	WNL	PD	Review and analyze issues re: appraisals and Disclosure Statement.	0.20	850.00	\$170.00
04/04/2018	TCF	PD	Review and analysis of transcript of hearing and Court's statements regarding updated information needed for disclosure statement; draft and revise disclosure statement.	3.40	650.00	\$2,210.00
04/04/2018	TCF	PD	Conference call with A. Friedman regarding amendments to disclosure statement and related issues.	1.00	650.00	\$650.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/04/2018	TCF	PD	Telephone call with L. Gauthier regarding amendments to disclosure statement and scheduling issues.	0.20	650.00	\$130.00
04/04/2018	TCF	PD	Correspond with L. Gauthier regarding amended disclosure statement information.	0.10	650.00	\$65.00
04/04/2018	TCF	PD	Review and analysis of correspondence with tax expert regarding information for amended disclosure statement.	0.10	650.00	\$65.00
04/05/2018	TCF	PD	Preparation of first amended disclosure statement.	2.80	650.00	\$1,820.00
04/06/2018	WNL	PD	Analyze potential treatments of various claims in plan and effect of disallowance of certain Beitler Party claims.	1.40	850.00	\$1,190.00
04/06/2018	TCF	PD	Review and analysis of pending claims objections and litigation; review and revise disclosure statement regarding same.	5.20	650.00	\$3,380.00
04/08/2018	TCF	PD	Draft amended disclosure statement.	5.20	650.00	\$3,380.00
04/09/2018	TCF	PD	Review and analysis of documents, evidence and calculations; draft and revise amended disclosure statement.	6.40	650.00	\$4,160.00
04/09/2018	TCF	PD	Continued review and analysis of documents, evidence and calculations; draft and revise amended disclosure statement, evidentiary support.	3.00	650.00	\$1,950.00
04/10/2018	TCF	PD	Correspondence with L. Gauthier regarding amended disclosure statement preparation.	0.10	650.00	\$65.00
04/11/2018	TCF	PD	Preparation of first amended disclosure statement.	8.80	650.00	\$5,720.00
04/11/2018	TCF	PD	Correspond with team regarding first amended disclosure statement.	0.10	650.00	\$65.00
04/12/2018	WNL	PD	Review and analyze revised disclosure statement.	2.20	850.00	\$1,870.00
04/16/2018	WNL	PD	Review and comment on amended disclosure statement.	1.40	850.00	\$1,190.00
04/16/2018	TCF	PD	Correspondence with A. Friedman regarding disclosure statement.	0.10	650.00	\$65.00
04/17/2018	NPL	PD	Review email from A. Friedman regarding revised disclosure statement.	0.10	250.00	\$25.00
04/17/2018	WNL	PD	Review correspondence re: draft disclosure statement.	0.10	850.00	\$85.00
04/17/2018	WNL	PD	Review correspondence re: review of revised plan and disclosure statement.	0.10	850.00	\$85.00
04/17/2018	TCF	PD	Review and revise first amended disclosure statement.	3.20	650.00	\$2,080.00
04/17/2018	TCF	PD	Correspond with team regarding first amended disclosure statement.	0.10	650.00	\$65.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/17/2018	TCF	PD	Review and revise disclosure statement; circulate same.	1.20	650.00	\$780.00
04/19/2018	WNL	PD	Review revised disclosure statement.	1.30	850.00	\$1,105.00
04/19/2018	WNL	PD	Review correspondence re: information needed to complete the disclosure statement.	0.30	850.00	\$255.00
04/19/2018	TCF	PD	Review and analysis of plan and disclosure statement issues and preparation; timeline.	0.40	650.00	\$260.00
04/19/2018	TCF	PD	Correspondence with team regarding plan and disclosure statement issues and preparation; timeline.	0.10	650.00	\$65.00
04/20/2018	TCF	PD	Correspondence A. Friedman regarding plan and disclosure statement issues and preparation.	0.20	650.00	\$130.00
04/20/2018	TCF	PD	Review and analysis of plan and disclosure statement issues and preparation; evidentiary support and declarations.	0.30	650.00	\$195.00
04/23/2018	WNL	PD	Review questions to be answered in connection with the disclosure statement.	0.10	850.00	\$85.00
04/23/2018	WNL	PD	Review correspondence re: tax effect of disposal of assets and related issues.	0.20	850.00	\$170.00
04/23/2018	WNL	PD	Review and analyze draft declaration of Adam Meislik in support of approval of First Amended Disclosure Statement.	0.40	850.00	\$340.00
04/23/2018	TCF	PD	Draft declaration of financial advisor in support of disclosure statement approval and confirmation of plan; review and analysis of issues related thereto.	4.50	650.00	\$2,925.00
04/23/2018	TCF	PD	Attend to matters needed to be addressed in support of disclosure statement approval and confirmation of plan.	1.60	650.00	\$1,040.00
04/23/2018	TCF	PD	Drafting of declaration in support of valuation.	0.50	650.00	\$325.00
04/23/2018	TCF	PD	Review and analysis of issues regarding valuation and asset disposition.	0.40	650.00	\$260.00
04/23/2018	TCF	PD	Draft correspondence to team regarding open issues and information required.	0.20	650.00	\$130.00
04/23/2018	TCF	PD	Various communications with team regarding information required for amended disclosure statement.	0.40	650.00	\$260.00
04/24/2018	NPL	PD	Review and reply to email from T. Flanagan regarding professional fees; review same.	0.20	250.00	\$50.00
04/24/2018	NPL	PD	Draft email to L. Gauthier regarding professional fees.	0.10	250.00	\$25.00
04/24/2018	NPL	PD	Review notice of claims bar date.	0.10	250.00	\$25.00
04/24/2018	NPL	PD	Review multiple emails from T. Flanagan, A. Friedman and S. O'Keefe regarding amended	0.20	250.00	\$50.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			disclosure statement.			
04/24/2018	NPL	PD	Review and reply to email from L. Gauthier regarding professional fees for Lobel Weiland Golden Friedman.	0.10	250.00	\$25.00
04/24/2018	WNL	PD	Review correspondence re: supplemental bar date order.	0.10	850.00	\$85.00
04/24/2018	WNL	PD	Review correspondence re: first amended disclosure statement.	0.10	850.00	\$85.00
04/24/2018	WNL	PD	Review correspondence re:amount of administrative claims.	0.10	850.00	\$85.00
04/24/2018	WNL	PD	Review correspondence re: draft declaration on Adam Meislik in Support of Approval of Amended Disclosure Statement.	0.10	850.00	\$85.00
04/24/2018	WNL	PD	Review correspondence re: amount of administrative claims.	0.10	850.00	\$85.00
04/24/2018	WNL	PD	Review correspondence re: unpaid post petition taxes.	0.10	850.00	\$85.00
04/24/2018	WNL	PD	Review correspondence re: amount of administrative claims	0.10	850.00	\$85.00
04/24/2018	TCF	PD	Attend to plan and disclosure statement drafting and preparation.	1.40	650.00	\$910.00
04/24/2018	TCF	PD	Communications with team regarding plan and disclosure statement preparation; evidence and declarations in support.	0.20	650.00	\$130.00
04/25/2018	WNL	PD	Review correspondence re: tax returns.	0.10	850.00	\$85.00
04/25/2018	WNL	PD	Review correspondence re: valuation testimony.	0.20	850.00	\$170.00
04/25/2018	TCF	PD	Correspondence A. Meislik regarding plan and disclosure statement preparation; evidence and declaration in support.	0.10	650.00	\$65.00
04/25/2018	TCF	PD	Correspondence with team regarding open disclosure statement and plan issues.	0.10	650.00	\$65.00
04/25/2018	TCF	PD	Drafting of amended disclosure statement and preparation of evidentiary support.	5.60	650.00	\$3,640.00
04/25/2018	TCF	PD	Telephone conference with A. Friedman regarding plan structure issues.	0.50	650.00	\$325.00
04/25/2018	TCF	PD	Conference call with client and financial advisors regarding plan and claim issues.	1.00	650.00	\$650.00
04/25/2018	TCF	PD	Correspond with team regarding valuation and plan issues.	0.20	650.00	\$130.00
04/26/2018	WNL	PD	Review correspondence re: estimated professional fees.	0.10	850.00	\$85.00
04/26/2018	WNL	PD	Review correspondence re: additional information needed to complete Disclosure Statement.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/26/2018	TCF	PD	Review and revisions to disclosure statement and declarations.	2.20	650.00	\$1,430.00
04/27/2018	NPL	PD	Review emails regarding amended disclosure statement.	0.10	250.00	\$25.00
04/27/2018	WNL	PD	Review revised report re: Coffee Road Plaza.	0.20	850.00	\$170.00
04/27/2018	WNL	PD	Review correspondence re potential separate classification of claims.	0.10	850.00	\$85.00
04/27/2018	WNL	PD	Review correspondence re: possible use of "piut" option as a part of the Amended Plan.	0.20	850.00	\$170.00
04/27/2018	WNL	PD	Review correspondence and analyze issues re: classification of claims issues.	0.20	850.00	\$170.00
04/27/2018	TCF	PD	Preparation of first amended disclosure statement and plan.	1.40	650.00	\$910.00
04/27/2018	TCF	PD	Telephone conference with A. Friedman regarding plan issues.	0.40	650.00	\$260.00
04/27/2018	TCF	PD	Correspondence with client regarding claims and disclosure statement issues.	0.10	650.00	\$65.00
04/27/2018	TCF	PD	Review and analysis of open issues regarding disclosure statement.	0.40	650.00	\$260.00
04/27/2018	TCF	PD	Correspondence with financial advisors regarding information and claim issues.	0.10	650.00	\$65.00
04/27/2018	TCF	PD	Correspondence with team regarding valuation issues.	0.10	650.00	\$65.00
04/27/2018	TCF	PD	Review and analysis of issues regarding valuation and claims for disclosure statement.	0.40	650.00	\$260.00
04/28/2018	WNL	PD	Review correspondence re: plan issues.	0.10	850.00	\$85.00
04/28/2018	TCF	PD	Draft and revise disclosure statement and plan documents.	1.60	650.00	\$1,040.00
04/28/2018	TCF	PD	Review and analysis of support and evidence in support of plan and disclosure statement.	0.80	650.00	\$520.00
04/29/2018	WNL	PD	Review and analyze revised disclosure statement	1.80	850.00	\$1,530.00
04/29/2018	WNL	PD	Review correspondence re: latest iteration of disclosure statement.	0.10	850.00	\$85.00
04/29/2018	WNL	PD	Review correspondence re: revisions to disclosure statement.	0.40	850.00	\$340.00
04/29/2018	WNL	PD	Review correspondnce re: proposed schedules.	0.10	850.00	\$85.00
04/29/2018	WNL	PD	Review and analyze J. Bral's comments to Amended Disclosure Statement.	0.40	850.00	\$340.00
04/29/2018	WNL	PD	Review and analyze questions raised by Adam Meislik and answers thereto.	0.20	850.00	\$170.00
04/29/2018	WNL	PD	Review comments re: estimated amounts of claims in Amended Disclosure Statement.	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/29/2018	WNL	PD	Review additional correspondence re: proposed schedules.	0.20	850.00	\$170.00
04/29/2018	WNL	PD	Review John Bral's comments re: proposed schedules.	0.20	850.00	\$170.00
04/29/2018	WNL	PD	Review correspondence re: potential offsets to claims.	0.10	850.00	\$85.00
04/29/2018	WNL	PD	Review additional correspondence re: claims issues.	0.20	850.00	\$170.00
04/29/2018	WNL	PD	Review and analyze issues re: plan issues.	0.20	850.00	\$170.00
04/29/2018	WNL	PD	Review additional correspondence re: plan issues.	0.30	850.00	\$255.00
04/29/2018	WNL	PD	Review and analyze draft declaration of Adam meislik in support of Amended Plan.	0.50	850.00	\$425.00
04/29/2018	WNL	PD	Review redlined Amended Disclosure Statement.	0.80	850.00	\$680.00
04/29/2018	WNL	PD	Review correspondence re: ownership of truck.	0.10	850.00	\$85.00
04/29/2018	WNL	PD	Review and analyze calculations relevant to best interests test.	0.40	850.00	\$340.00
04/29/2018	WNL	PD	Review correspondence re: value of Eye Street project.	0.10	850.00	\$85.00
04/29/2018	WNL	PD	Review revised Disclosure Statement.	0.80	850.00	\$680.00
04/29/2018	WNL	PD	Review correspondence re: declarations of appraisers.	0.10	850.00	\$85.00
04/29/2018	WNL	PD	Review correspondence re: action needed to complete Disclosure Statement.	0.20	850.00	\$170.00
04/29/2018	WNL	PD	Review correspondence re: appraisal of Eye Street property.	0.10	850.00	\$85.00
04/29/2018	WNL	PD	Review correspondence re: documentation supporting various claims.	0.10	850.00	\$85.00
04/29/2018	TCF	PD	Drafting and revisions to first amended disclosure statement and evidence in support; review of documents and preparation of analysis and exhibits in support of plan and disclosure statement approval; communications with team and preparation for filing of first amended plan and disclosure statement.	6.80	650.00	\$4,420.00
04/29/2018	TCF	PD	Continued drafting and revisions to first amended disclosure statement and evidence in support; review of documents and preparation of analysis and exhibits in support of plan and disclosure statement approval; communications with team and preparation for filing of first amended plan and disclosure statement.	3.30	650.00	\$2,145.00
04/30/2018	NPL	PD	Review emails between T. Flanagan and J. Bral regarding updates to amended disclosure statement.	0.20	250.00	\$50.00
04/30/2018	NPL	PD	Draft email to L. Gauthier regarding amended disclosure statement; review and reply to email from	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			L. Gauthier regarding same.			
04/30/2018	NPL	PD	Review multiple emails regarding status of amended disclosure statement; declarations and redlined documents.	0.20	250.00	\$50.00
04/30/2018	NPL	PD	Draft email to L. Gauthier regarding status of amended disclosure statement.	0.10	250.00	\$25.00
04/30/2018	NPL	PD	Telephone call with W. Lobel regarding updated amended disclosure statement.	0.10	250.00	\$25.00
04/30/2018	NPL	PD	Telephone call with L. Gauthier regarding updated amended disclosure statement.	0.10	250.00	\$25.00
04/30/2018	NPL	PD	Telephone call to N. Brown regarding amended disclosure statement; signature request and assistance.	0.10	250.00	\$25.00
04/30/2018	NPL	PD	Draft email to L. Gauthier regarding finalized amended disclosure statement.	0.10	250.00	\$25.00
04/30/2018	WNL	PD	Review additional correspondence re: revised disclosure statement.	0.20	850.00	\$170.00
04/30/2018	WNL	PD	Review and analyze best interests of creditors calculation.	0.20	850.00	\$170.00
04/30/2018	WNL	PD	Review correspondence re: professional fees.	0.10	850.00	\$85.00
04/30/2018	WNL	PD	Review latest version of revised disclosure statement.	0.70	850.00	\$595.00
04/30/2018	WNL	PD	Review additional correspondence re: estimates of professional fees for disclosure statement.	0.10	850.00	\$85.00
04/30/2018	WNL	PD	Review aditional correspondence re: disclosure statement.	0.20	850.00	\$170.00
04/30/2018	WNL	PD	Review correspondence re: further revision of disclosure statement.	0.20	850.00	\$170.00
04/30/2018	WNL	PD	Review and analyze draft plan.	1.30	850.00	\$1,105.00
04/30/2018	WNL	PD	Review and analyze latest iteration of disclosure statement.	0.80	850.00	\$680.00
04/30/2018	WNL	PD	Review comments and correspondence re: final versions of plan, disclosure statement and A. Meislik declaration.	0.30	850.00	\$255.00
04/30/2018	WNL	PD	Review final version of A. Meislik declaration and related correspondence.	0.40	850.00	\$340.00
04/30/2018	WNL	PD	Review correspondence and telephone call with N. Lockwood re: execution of disclosure statement.	0.10	850.00	\$85.00
04/30/2018	WNL	PD	Review correspondence re: classes in plan.	0.10	850.00	\$85.00
04/30/2018	WNL	PD	Review additional comments to draft plan.	0.10	850.00	\$85.00
04/30/2018	WNL	PD	Review correspondence re: declaration of John Pyster.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/30/2018	WNL	PD	Review correspondence re: amended plan and disclosure statement.	0.10	850.00	\$85.00
04/30/2018	WNL	PD	Review declatation of Scott Pyfl and attached appraisals.	0.50	850.00	\$425.00
04/30/2018	WNL	PD	Review and analyze final form of declaration of Adam Meislik in support of approval of disclosure statement.	0.40	850.00	\$340.00
04/30/2018	WNL	PD	Review final version of amended plan.	0.60	850.00	\$510.00
04/30/2018	WNL	PD	Review final version of First Amended Disclosure Statement.	1.20	850.00	\$1,020.00
04/30/2018	WNL	PD	Review correspondence re: filing of Amended Plan and related documents.	0.10	850.00	\$85.00
04/30/2018	WNL	PD	Review correspondence re: declaration of Scott Pfyl.	0.10	850.00	\$85.00
04/30/2018	WNL	PD	Review additional correspondence re: financial underpinnings of Plan.	0.10	850.00	\$85.00
04/30/2018	WNL	PD	Review comments to provisions of Amended Plan.	0.10	850.00	\$85.00
04/30/2018	WNL	PD	Review correspondence re: revisions to Amended Plan.	0.10	850.00	\$85.00
04/30/2018	WNL	PD	Review correspondence re: additional changes to Amended Plan.	0.10	850.00	\$85.00
04/30/2018	WNL	PD	Review additional correspondence re: numbers included in Amended Plan.	0.20	850.00	\$170.00
04/30/2018	WNL	PD	Review additional correspondence re: changes to Amended Plan and Disclosure Statement.	0.30	850.00	\$255.00
04/30/2018	WNL	PD	Review comments to declaration of Adam Meislik.	0.20	850.00	\$170.00
04/30/2018	WNL	PD	Review correspondence re: issues concerning exemptions in Amended Plan.	0.20	850.00	\$170.00
04/30/2018	WNL	PD	Review correspondence re: value of non-real estate assets.	0.20	850.00	\$170.00
04/30/2018	TCF	PD	Review and revise first amended disclosure statement and evidence in support.	2.20	650.00	\$1,430.00
04/30/2018	TCF	PD	Draft first amended plan.	1.80	650.00	\$1,170.00
04/30/2018	TCF	PD	Draft Declaration of J. Pyster of Access Appraisers in support of Sandpiper valuation.	0.80	650.00	\$520.00
04/30/2018	TCF	PD	Draft Declaration of S. Pfyl of BBG, Inc. in support of Westcliff, Mission and Javaher valuation.	1.20	650.00	\$780.00
04/30/2018	TCF	PD	Drafting and revisions to plan, disclosure statement, financial advisor declaration, appraisers' declarations and related documents; preparation for filing.	5.80	650.00	\$3,770.00
04/30/2018	TCF	PD	Finalize plan, disclosure statement, financial advisor declaration and exhibits for filing; coordination regarding same.	1.40	650.00	\$910.00

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				121.50		\$83,975.00
Relief from Stay						
04/02/2018	TCF	RFS	Review and analysis of orders regarding relief from stay to proceed with arbitration; issues with respect thereto.	0.10	650.00	\$65.00
04/02/2018	TCF	RFS	Review and analysis of issues regarding relief from stay orders; impact and strategy with respect thereto.	0.10	650.00	\$65.00
04/02/2018	TCF	RFS	Communications with team regarding relief from stay orders (arbitrations) and issues related.	0.10	650.00	\$65.00
04/02/2018	NPL	RFS	Review entered order regarding objections to form orders regarding Beitler parties form orders to motions for relief from stay.	0.10	250.00	\$25.00
04/02/2018	NPL	RFS	Telephone call with L. Gauthier regarding lodging orders regarding Beitler parties form orders to motions for relief from stay.	0.10	250.00	\$25.00
04/02/2018	NPL	RFS	Finalize orders regarding Beitler parties form orders to motions for relief from stay.	0.40	250.00	\$100.00
04/02/2018	NPL	RFS	Draft email to A. Friedman, W. Lobel, T. Flanagan, and S. O'Keefe regarding lodging of orders regarding Beitler parties form orders to motions for relief from stay.	0.10	250.00	\$25.00
04/02/2018	WNL	RFS	Review order re: scope of relief from stay and related correspondence.	0.30	850.00	\$255.00
04/02/2018	WNL	RFS	Review entered orders granting relief from stay and related correspondence.	0.20	850.00	\$170.00
04/02/2018	WNL	RFS	Review and analyze orders granting relief from	0.20	850.00	\$170.00
04/03/2018	WNL	RFS	Review orders entered in Relief from Stay issues and consider strategy considering Court's Order.	0.20	850.00	\$170.00
04/04/2018	WNL	RFS	Review and analyze issues and arguments re: scope of relief from stay orders.	0.30	850.00	\$255.00
04/04/2018	WNL	RFS	Review and analyze Order ranting Relief from Stay.	0.10	850.00	\$85.00
04/23/2018	WNL	RFS	Review and execute stipulation re: order granting Motion to Grant Relief from Stay	0.10	850.00	\$85.00
				2.40		\$1,560.00

Tax Issues [B240]

04/23/2018	WNL	TI	Review correspondence re: tax effect of loss of interests in properties.	0.10	850.00	\$85.00
04/24/2018	WNL	TI	review correspondence re: unpaid post petition taxes.	0.10	850.00	\$85.00
04/25/2018	WNL	TI	Review correspondence re: tax returns.	0.10	850.00	\$85.00
04/26/2018	WNL	TI	Participate in conference call re: tax effect of sale of	0.40	850.00	\$340.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			properties.			
04/26/2018	WNL	TI	Review correspondence re: tax issues involving sale of properties.	0.10	850.00	\$85.00
04/27/2018	WNL	TI	Review correspondence re: tax issues and related issues.	0.20	850.00	\$170.00
04/27/2018	WNL	TI	Review correspondence and related documents re: capital gains analysis.	0.10	850.00	\$85.00
04/27/2018	WNL	TI	Review additional correspondence re: capital gains analysis.	0.10	850.00	\$85.00
04/27/2018	WNL	TI	Review correspondence re: capital gains analysis.	0.10	850.00	\$85.00
04/27/2018	WNL	TI	Review additional correspondence re: tax issues raised by the Amended Plan.	0.20	850.00	\$170.00
04/27/2018	WNL	TI	Review additional correspondence re: tax implications of Amended Plan.	0.10	850.00	\$85.00
04/29/2018	WNL	TI	Review correspondence re: tax consequences of liquidation of assets.	0.10	850.00	\$85.00
				1.70	\$1,445.00	

TOTAL SERVICES FOR THIS MATTER: **\$241,285.00**

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Expenses

03/21/2018	PO	Postage [E108] Bral- courtesy copies to chambers, WNL	9.61
03/30/2018	PO	Postage [E108] Bral- courtesy copies to chambers, WNL	22.47
04/05/2018	OS	BBG, Inv., WNL	12,400.00
04/05/2018	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
04/05/2018	RE2	SCAN/COPY (21 @0.10 PER PG)	2.10
04/05/2018	RE2	SCAN/COPY (21 @0.10 PER PG)	2.10
04/05/2018	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
04/10/2018	CL	Courtlink charges	18.12
04/10/2018	CL	Courtlink charges	0.00
04/10/2018	CL	Courtlink charges	0.54
04/10/2018	CL	Courtlink charges	0.56
04/10/2018	CL	Courtlink charges	0.56
04/10/2018	OS	GSO, Delivery of signed engagement letter and check to appraisal firm: BBG, Inc. WNL	25.22
04/10/2018	RE2	SCAN/COPY (15 @0.10 PER PG)	1.50
04/11/2018	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
04/11/2018	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
04/11/2018	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
04/11/2018	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
04/11/2018	RE2	SCAN/COPY (18 @0.10 PER PG)	1.80
04/11/2018	RE2	SCAN/COPY (18 @0.10 PER PG)	1.80

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04/11/2018	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
04/11/2018	RE2	SCAN/COPY (22 @0.10 PER PG)	2.20
04/11/2018	RE2	SCAN/COPY (61 @0.10 PER PG)	6.10
04/11/2018	SO	Secretarial Overtime - Jennifer O'Keefe	135.48
04/12/2018	OS	GSO, Inv. 3607670, copies	24.75
04/12/2018	PO	Postage [E108] Bral-courtesy copies to judges chambers, WNL	24.75
04/16/2018	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
04/16/2018	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
04/16/2018	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
04/16/2018	RE2	SCAN/COPY (38 @0.10 PER PG)	3.80
04/16/2018	RE2	SCAN/COPY (38 @0.10 PER PG)	3.80
04/16/2018	RE2	SCAN/COPY (56 @0.10 PER PG)	5.60
04/16/2018	RE2	SCAN/COPY (106 @0.10 PER PG)	10.60
04/16/2018	RE2	SCAN/COPY (226 @0.10 PER PG)	22.60
04/17/2018	OS	Case Anywhere access fee for Bral vs. Westcliff Arbitration matter, WNL	19.20
04/17/2018	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
04/17/2018	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
04/17/2018	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
04/17/2018	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
04/17/2018	RE2	SCAN/COPY (15 @0.10 PER PG)	1.50
04/17/2018	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60

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04/17/2018	RE2	SCAN/COPY (17 @0.10 PER PG)	1.70
04/17/2018	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
04/17/2018	RE2	SCAN/COPY (21 @0.10 PER PG)	2.10
04/17/2018	RE2	SCAN/COPY (22 @0.10 PER PG)	2.20
04/17/2018	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
04/17/2018	RE2	SCAN/COPY (35 @0.10 PER PG)	3.50
04/17/2018	RE2	SCAN/COPY (38 @0.10 PER PG)	3.80
04/17/2018	RE2	SCAN/COPY (46 @0.10 PER PG)	4.60
04/17/2018	RE2	SCAN/COPY (69 @0.10 PER PG)	6.90
04/17/2018	RE2	SCAN/COPY (81 @0.10 PER PG)	8.10
04/17/2018	RE2	SCAN/COPY (108 @0.10 PER PG)	10.80
04/18/2018	GP	Guest Parking [E124] Parking for court hearing on Continued Status Conference, WNL	2.75
04/18/2018	TE	Travel Expense [E110] Parking	2.75
04/23/2018	RE2	SCAN/COPY (22 @0.10 PER PG)	2.20
04/25/2018	RE2	SCAN/COPY (31 @0.10 PER PG)	3.10
04/25/2018	RE2	SCAN/COPY (243 @0.10 PER PG)	24.30
04/26/2018	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
04/30/2018	PAC	Pacer - Court Research	38.10
04/30/2018	RE2	SCAN/COPY (109 @0.10 PER PG)	10.90

Total Expenses for this Matter **\$12,901.06**

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REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For current services rendered through 04/30/2018

Total Fees	\$241,285.00
Chargeable costs and disbursements	\$12,901.06
Total Due on Current Invoice.....	\$254,186.06

Outstanding Balance from prior Invoices as of 04/30/2018 **(May not reflect recent payments)**

Invoice Number	Invoice Date	Fees Billed	Expenses Billed	Balance Due
118521	01/31/2018	\$64,977.50	\$1.40	\$64,978.90
118768	02/28/2018	\$89,105.00	\$6,717.72	\$95,822.72
119267	03/31/2018	\$170,795.00	\$818.42	\$171,613.42
Total Amount Due on Current and Prior Invoices				\$586,601.10

Pachulski Stang Ziehl & Jones LLP

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

June 13, 2018
Invoice 119732
Client 10601
Matter 00001
WNL

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2018

FEES	\$165,330.00
EXPENSES	\$2,241.54
TOTAL CURRENT CHARGES	\$167,571.54
BALANCE FORWARD	\$586,601.10
TOTAL BALANCE DUE	\$754,172.64

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	1.40	\$1,170.00
BL	Bankruptcy Litigation [L430]	4.80	\$3,530.00
CA	Case Administration [B110]	3.70	\$2,605.00
CO	Claims Admin/Objections[B310]	110.50	\$73,555.00
FE	Fee/Employment Application	0.50	\$425.00
FP	Fees of Professionals	4.00	\$1,000.00
LN	Litigation (Non-Bankruptcy)	1.30	\$1,105.00
PD	Plan & Disclosure Stmt. [B320]	110.50	\$81,485.00
V	Venue	0.70	\$455.00
		237.40	\$165,330.00

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	28.70	\$7,175.00
SAOS	O'Keefe, Sean A	Counsel	750.00	28.60	\$21,450.00
TCF	Flanagan, Tavi C.	Counsel	650.00	81.90	\$53,235.00
WNL	Lobel, William N.	Partner	850.00	98.20	\$83,470.00
				237.40	\$165,330.00

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Outside Services	\$2,000.00
Pacer - Court Research	\$23.70
Postage [E108]	\$43.54

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Reproduction/ Scan Copy	\$7.90
Travel Expense [E110]	\$14.00
Transcript [E116]	\$152.40
	<hr/> \$2,241.54

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
05/01/2018	WNL	AA	Review declaration of appraiser of Sandpiper property.	0.10	850.00	\$85.00
05/01/2018	WNL	AA	Review correspondence re: value of non real estate assets.	0.10	850.00	\$85.00
05/01/2018	TCF	AA	Review and analysis of litigation claims and rights against third parties.	0.10	650.00	\$65.00
05/02/2018	WNL	AA	Review correspondence re: analysis of assets.	0.10	850.00	\$85.00
05/04/2018	WNL	AA	Review correspondence re: malpractice claims against former counsel.	0.10	850.00	\$85.00
05/07/2018	WNL	AA	Review correspondence re: basis for claims against B. Beitler.	0.10	850.00	\$85.00
05/08/2018	WNL	AA	Review list of personal exemptions and related correspondence.	0.10	850.00	\$85.00
05/14/2018	WNL	AA	Review deed of trust re: Mineral King Investor project.	0.10	850.00	\$85.00
05/14/2018	WNL	AA	Review correspondence re: malpractice insurance for Bobby Samini.	0.10	850.00	\$85.00
05/14/2018	WNL	AA	Review and analyze evidence and action to be taken in connection with issues concerning capital accounts in various entities.	0.30	850.00	\$255.00
05/17/2018	WNL	AA	Review correspondence re: section 544 and 547 issues.	0.10	850.00	\$85.00
05/18/2018	WNL	AA	Review and analyze correspondence re: strategy in determining course of action re: 544 and 547 actions and appeal of default judgment.	0.10	850.00	\$85.00
				1.40		\$1,170.00

Bankruptcy Litigation [L430]

05/15/2018	TCF	BL	Review and analysis of Steward motion to dismiss and related issues.	0.30	650.00	\$195.00
05/15/2018	TCF	BL	Correspondence L. Gauthier regarding Steward motion to dismiss and related issues.	0.30	650.00	\$195.00
05/15/2018	TCF	BL	Correspondence S. O'Keefe regarding Steward motion to dismiss.	0.30	650.00	\$195.00
05/15/2018	WNL	BL	Review initial draft of Motion to Dismiss Adversary Complaint.	0.50	850.00	\$425.00
05/15/2018	WNL	BL	Review correspondence re: Motion to Dismiss Adversary.	0.10	850.00	\$85.00
05/15/2018	WNL	BL	Review correspondence re: non-dischargeability actions.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/15/2018	NPL	BL	Review multiple emails regarding Beitler adversary actions.	0.20	250.00	\$50.00
05/15/2018	SAO	BL	Review and update motion to dismiss Steward nondischargeability complaint	0.40	750.00	\$300.00
05/29/2018	TCF	BL	Correspondence with team regarding motion to dismiss Steward first amended complaint.	0.10	650.00	\$65.00
05/29/2018	TCF	BL	Correspondence with L. Gauthier regarding exhibits and declaration in support of motion to dismiss Steward first amended complaint.	0.10	650.00	\$65.00
05/29/2018	TCF	BL	Review correspondence from A. Friedman regarding motion to dismiss Steward first amended complaint.	0.10	650.00	\$65.00
05/29/2018	WNL	BL	Review and analyze Motion To Dismiss Adversary and Supporting Declaration.	0.80	850.00	\$680.00
05/29/2018	SAO	BL	Review and revise motion to dismiss dischargeability action filed by Steward Financial.	1.00	750.00	\$750.00
05/30/2018	SAO	BL	Revise motion to dismiss adversary filed by Steward Financial.	0.50	750.00	\$375.00
				4.80	\$3,530.00	

Case Administration [B110]

05/01/2018	TCF	CA	Review and analysis of schedule amendments and claim issues.	0.10	650.00	\$65.00
05/01/2018	TCF	CA	Review and revise schedule amendment and reservation of rights regarding litigation claims.	0.20	650.00	\$130.00
05/01/2018	TCF	CA	Correspond with L. Gauthier regarding schedule amendments.	0.10	650.00	\$65.00
05/02/2018	WNL	CA	Review and analyze amended schedule A/B.	0.20	850.00	\$170.00
05/07/2018	WNL	CA	Review updated summary of critical dates.	0.10	850.00	\$85.00
05/11/2018	NPL	CA	Review critical date memorandum; attention to dates and deadlines regarding same.	0.20	250.00	\$50.00
05/15/2018	WNL	CA	Review monthly operating report for April, 2018.	0.10	850.00	\$85.00
05/16/2018	WNL	CA	Review revised schedules and related correspondnce.	0.10	850.00	\$85.00
05/16/2018	WNL	CA	Review revised critical dates summary.	0.10	850.00	\$85.00
05/16/2018	NPL	CA	Review and reply to email from L. Gauthier regarding critical dates and deadlines; attention to same.	0.30	250.00	\$75.00
05/16/2018	NPL	CA	Review amended schedules A/B and schedule C.	0.10	250.00	\$25.00
05/18/2018	WNL	CA	Review latest Joint Status Report.	0.10	850.00	\$85.00
05/31/2018	WNL	CA	Review and analyze analysis of Motion to Convert case filed by Beitler parties.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/31/2018	WNL	CA	Review revised critical date summary.	0.10	850.00	\$85.00
05/31/2018	WNL	CA	Review and analyze Beitler Motion to Convert chapter 11 to chapter 7 and attached Exhibits.	1.30	850.00	\$1,105.00
05/31/2018	TCF	CA	Review and analysis of motion to convert.	0.40	650.00	\$260.00
05/31/2018	TCF	CA	Communications with team regarding motion to convert.	0.10	650.00	\$65.00
				3.70		\$2,605.00

Claims Admin/Objections[B310]

05/01/2018	TCF	CO	Review and analysis of reservation of rights against third parties.	0.10	650.00	\$65.00
05/01/2018	NPL	CO	Review and reply to email from A. Friedman regarding reply to objection of the Beitler parties regarding claim objections.	0.10	250.00	\$25.00
05/01/2018	SAO	CO	Meeting with W. Lobel and A. Friedman re review and comments re closing arguments on crime-fraud argument set for May 3, 2018.	2.00	750.00	\$1,500.00
05/02/2018	TCF	CO	Correspondence with A. Friedman regarding writ of attachment and release of lien matters.	0.10	650.00	\$65.00
05/02/2018	TCF	CO	Review and analysis of amended schedules.	0.10	650.00	\$65.00
05/02/2018	SAO	CO	Prepare closing statement for arguments on application of crime-fraud exception to discovery produced by Beitler Parties re Motion to Strike Claims.	4.20	750.00	\$3,150.00
05/03/2018	WNL	CO	Prepare for and attend closing arguments on crime fraud issues.	4.80	850.00	\$4,080.00
05/03/2018	WNL	CO	Review comments of handwriting expert re: initials on altered pages.	0.10	850.00	\$85.00
05/03/2018	WNL	CO	Review correspondence re:handwriting analysis of forged initials.	0.10	850.00	\$85.00
05/03/2018	WNL	CO	Review additional correspondence re: handwriting analysis.	0.10	850.00	\$85.00
05/03/2018	WNL	CO	Review and analyze Beitler brief re: privilege issues.	0.50	850.00	\$425.00
05/03/2018	NPL	CO	Prepare counsel for hearing on application for Crime-Fraud.	0.30	250.00	\$75.00
05/03/2018	SAO	CO	Attend hearing closing argument re whether crime fraud exception applies to privilege logs and documents re motion to strike claims.	3.50	750.00	\$2,625.00
05/03/2018	SAO	CO	Prepare draft order re crime-fraud exception to privileges asserted by Beitler Parties.	0.50	750.00	\$375.00
05/03/2018	SAO	CO	Review revise and practice closing arguments re whether crime-fraud exception to the attorney-client	4.10	750.00	\$3,075.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			privilege applies within context of motion to strike claims.			
05/04/2018	WNL	CO	Review and comment on draft of order containing Court's ruling on in camera inspection of privileged documents.	0.20	850.00	\$170.00
05/04/2018	WNL	CO	Review correspondence re: entry of order on crime fraud exception.	0.40	850.00	\$340.00
05/04/2018	WNL	CO	Telephone calls with A. Friedman and G. Klausner re: possible settlement of issues re: crime fraud exception.	0.60	850.00	\$510.00
05/04/2018	WNL	CO	Review correspondence re: supplemental brief on 'unclean hands'.	0.20	850.00	\$170.00
05/04/2018	WNL	CO	Review revised Order re: crime fraud exception and related correspondence.	0.20	850.00	\$170.00
05/04/2018	WNL	CO	Review initial draft of Order re: crime fraud exception.	0.10	850.00	\$85.00
05/04/2018	WNL	CO	Review correspondence re: analysis of forged initials.	0.10	850.00	\$85.00
05/04/2018	WNL	CO	Analyze courses of action available re: crime fraud exception issues.	0.40	850.00	\$340.00
05/04/2018	NPL	CO	Office conference with W. Lobel regarding status of hearing on application for crime-brief.	0.10	250.00	\$25.00
05/04/2018	NPL	CO	Review and reply to email from A. Friedman regarding order on crime-brief application; review same.	0.10	250.00	\$25.00
05/04/2018	NPL	CO	Revise order regarding crime-brief application; forward same to W. Lobel for review.	0.20	250.00	\$50.00
05/04/2018	NPL	CO	Review transcript request for hearing on crime-brief application; draft email to Briggs Reporting regarding same.	0.20	250.00	\$50.00
05/04/2018	NPL	CO	Draft email to A. Friedman regarding transcript of hearing for crime-brief application.	0.10	250.00	\$25.00
05/04/2018	NPL	CO	Prepare notice of lodgment regarding order on crime-brief application.	0.30	250.00	\$75.00
05/04/2018	NPL	CO	Review and reply to email from A. Friedman regarding order on crime fraud application.	0.10	250.00	\$25.00
05/04/2018	NPL	CO	Confer with W. Lobel regarding order on crime-fraud application.	0.10	250.00	\$25.00
05/04/2018	NPL	CO	Revise and finalize order regarding crime-fraud application.	0.40	250.00	\$100.00
05/04/2018	NPL	CO	Revise and finalize notice of lodgment regarding crime fraud application.	0.30	250.00	\$75.00
05/04/2018	NPL	CO	Final review of order regarding crime fraud exception with W. Lobel.	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/04/2018	SAO	CO	Conference call with W. Lobel and A. Friedman re settlement discussions with Beitler Parties counsel.	0.30	750.00	\$225.00
05/05/2018	WNL	CO	Review and respond to correspondence re: settlement structure and strategy.	0.30	850.00	\$255.00
05/07/2018	WNL	CO	Review correspondence re: discovery issues.	0.10	850.00	\$85.00
05/07/2018	WNL	CO	Review additional correspondence re: discovery issues.	0.20	850.00	\$170.00
05/07/2018	WNL	CO	Telephone call with A. Friedman re: settlement discussions with G. Klausner.	0.40	850.00	\$340.00
05/07/2018	WNL	CO	Second telephone call with A. Friedman re: settlement and related issues.	0.40	850.00	\$340.00
05/07/2018	WNL	CO	Review correspondence re: strategy re: forged initials.	0.20	850.00	\$170.00
05/07/2018	WNL	CO	Review factual and evidentiary objections to claims objections.	0.70	850.00	\$595.00
05/07/2018	SAO	CO	Prepare request for electronically stored information (ESI) from Barry Beitler and Beitler Commercial Real Estate Services.	2.20	750.00	\$1,650.00
05/08/2018	WNL	CO	Review correspondence re: judgment based on foreclosure of Federal Unit.	0.10	850.00	\$85.00
05/08/2018	WNL	CO	Review correspondence re: Mineral King claim.	0.10	850.00	\$85.00
05/08/2018	SAO	CO	Conference call with Gary Pemberton re search words for ESI discovery being propounded to be Beitler and BCRS.	0.20	750.00	\$150.00
05/08/2018	SAO	CO	Prepare search words re BCRS and Beitler computer inquiries re ESI requests.	0.40	750.00	\$300.00
05/08/2018	SAO	CO	Review drafts of requests for production of documents seeking ESI.	0.30	750.00	\$225.00
05/09/2018	WNL	CO	Review and analyze transcript of hearing on Motion to Disallow Claims.	1.60	850.00	\$1,360.00
05/09/2018	WNL	CO	Analyze issues and consider action to be taken re: Disallowance of Beitler claims.	0.60	850.00	\$510.00
05/10/2018	WNL	CO	Review financial analysis of potential global settlement and correspondence re: same.	0.30	850.00	\$255.00
05/10/2018	WNL	CO	Analyze and consider potential settlement structures and amounts and issues raised thereby.	0.70	850.00	\$595.00
05/10/2018	WNL	CO	Review correspondence re: transcripts of hearings.	0.10	850.00	\$85.00
05/11/2018	TCF	CO	Telephone conference with A. Friedman regarding supplement to motion to strike proofs of claim.	0.20	650.00	\$130.00
05/11/2018	WNL	CO	Review correspondence re: motion for attorney's fees in connection with motion to strike claims.	0.10	850.00	\$85.00
05/11/2018	WNL	CO	Review draft order re: in camera review of	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			privileged documents and related correspondence.			
05/11/2018	WNL	CO	Review correspondence re: potential settlement issues.	0.10	850.00	\$85.00
05/11/2018	WNL	CO	Review and analyze factual and evidentiary issues concerning claims objections.	0.90	850.00	\$765.00
05/11/2018	NPL	CO	Review and reply to email from A. Friedman regarding order on crime-brief application.	0.10	250.00	\$25.00
05/11/2018	NPL	CO	Draft email to A. Friedman regarding order on crime-fraud application.	0.10	250.00	\$25.00
05/11/2018	NPL	CO	Revise and finalize order on crime-fraud exception.	0.30	250.00	\$75.00
05/11/2018	NPL	CO	Telephone call with L. Gauthier regarding order on crime-fraud exception.	0.10	250.00	\$25.00
05/11/2018	NPL	CO	Review and reply to email from T. Flanagan regarding professional fees relating to motion to strike.	0.10	250.00	\$25.00
05/11/2018	NPL	CO	Attention to analysis of professional fees related to motion to strike.	1.10	250.00	\$275.00
05/14/2018	NPL	CO	Review and reply to email from A. Friedman regarding professional fees associated with motion to strike.	0.10	250.00	\$25.00
05/14/2018	NPL	CO	Telephone call with L. Gauthier regarding professional fees related to motion to strike claims.	0.10	250.00	\$25.00
05/14/2018	NPL	CO	Attention to analysis and preparation of exhibit to professional fees regarding motion to strike Beitler Parties claims.	4.30	250.00	\$1,075.00
05/14/2018	NPL	CO	Review entered order regarding crime-fraud application.	0.10	250.00	\$25.00
05/14/2018	NPL	CO	Draft email to S. O'Keefe, W. Lobel and T. Flanagan regarding professional fees related to motion to strike.	0.10	250.00	\$25.00
05/14/2018	NPL	CO	Confer with W. Lobel regarding professional fees related to motion to strike Beitler Parties claims.	0.10	250.00	\$25.00
05/14/2018	NPL	CO	Review and reply to email from S. O'Keefe regarding professional fees relating to motion to strike Beitler parties claims.	0.10	250.00	\$25.00
05/14/2018	NPL	CO	Review and reply to email from W. Lobel regarding professional fees relating to motion to strike Beitler parties claims.	0.10	250.00	\$25.00
05/14/2018	WNL	CO	Telephone call with Alan Friedman re: settlement and related issues.	0.40	850.00	\$340.00
05/14/2018	WNL	CO	Review Court's Order on crime/fraud exception.	0.10	850.00	\$85.00
05/14/2018	WNL	CO	Telephone call with Ron Williams re: report on initials on altered Operating Agreement.	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/14/2018	WNL	CO	Review correspondence and confer with N. Lockwood re: attorneys fees component to Motion for Sanctions.	0.10	850.00	\$85.00
05/14/2018	WNL	CO	Review additional correspondence re: forgery and related issues.	0.10	850.00	\$85.00
05/14/2018	WNL	CO	Telephone call with John Bral re: settlement and related issues.	0.20	850.00	\$170.00
05/14/2018	WNL	CO	Telephone call with A. Friedman re: Court's Order re: crime fraud exception.	0.20	850.00	\$170.00
05/14/2018	WNL	CO	Review potential defenses to claims objections and related issues.	0.60	850.00	\$510.00
05/14/2018	TCF	CO	Review and analysis of documents and transcripts regarding crime-fraud / perjury issues and supplemental evidence.	3.50	650.00	\$2,275.00
05/14/2018	TCF	CO	Draft pleading regarding supplemental evidence re perjury and in support of Motion to Strike.	4.20	650.00	\$2,730.00
05/14/2018	TCF	CO	Review and analysis of Order re: crime-fraud issues.	0.10	650.00	\$65.00
05/14/2018	TCF	CO	Telephone conference with A. Friedman re: crime-fraud Order and issues related thereto.	0.10	650.00	\$65.00
05/14/2018	SAO	CO	Conference call re claims based upon Mineral King property (Cannae filed) and review of prospective actions re objections to claims.	0.20	750.00	\$150.00
05/15/2018	WNL	CO	Telephone call with Alan Friedman re: handwriting analysis and related issues.	0.40	850.00	\$340.00
05/15/2018	WNL	CO	Review and analyze report of handwriting expert.	0.20	850.00	\$170.00
05/15/2018	WNL	CO	Review correspondence re: Supplemental Brief.	0.20	850.00	\$170.00
05/15/2018	WNL	CO	Review and analyze draft Supplemental Brief re: Further Evidence in Support of Motion to Strike Claims.	1.10	850.00	\$935.00
05/15/2018	WNL	CO	Review Declarations in Support of Supplemental Brief.	0.30	850.00	\$255.00
05/15/2018	WNL	CO	Review comments to draft Supplemental Brief.	0.20	850.00	\$170.00
05/15/2018	WNL	CO	Review additional correspondence and comments re: draft Supplemental Brief.	0.20	850.00	\$170.00
05/15/2018	WNL	CO	Review additional comments re: Steward action.	0.10	850.00	\$85.00
05/15/2018	WNL	CO	Review additional correspondence re: timing and related issues and related issues concerning Supplemental Brief.	0.20	850.00	\$170.00
05/15/2018	WNL	CO	Review additional correspondence re: Supplemental Brief.	0.20	850.00	\$170.00
05/15/2018	TCF	CO	Draft supplement in support of Motion to Strike.	6.80	650.00	\$4,420.00
05/15/2018	TCF	CO	Review and revise supplement in support of Motion	0.90	650.00	\$585.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			to Strike.			
05/15/2018	TCF	CO	Correspondence with team regarding supplement in support of Motion to Strike.	0.10	650.00	\$65.00
05/15/2018	NPL	CO	Review and analysis of professional fees associated with supplement to Motion to Strike Beitler Parties proofs of claim.	4.20	250.00	\$1,050.00
05/16/2018	WNL	CO	Review and analyze comments to Supplemental Brief.	0.50	850.00	\$425.00
05/16/2018	NPL	CO	Attention to the analysis of professional fees related to supplement to Motion to Strike Beitler Parties proofs of claim.	3.60	250.00	\$900.00
05/17/2018	WNL	CO	Review and analyze revised Report of handwriting Expert.	0.40	850.00	\$340.00
05/17/2018	WNL	CO	Draft correspondence re: revised Report of Handwriting Expert.	0.10	850.00	\$85.00
05/17/2018	WNL	CO	Review correspondence re: Declaration of Ron Williams re: Handwriting Report.	0.10	850.00	\$85.00
05/17/2018	WNL	CO	Review draft declaration of Ron Williams in support of Motion to Strike Claims.	0.10	850.00	\$85.00
05/17/2018	WNL	CO	Review correspondence re: professional fees as a part of sanctions.	0.10	850.00	\$85.00
05/17/2018	WNL	CO	Review draft declaration of A. Friedman in support of Supplemental Brief.	0.10	850.00	\$85.00
05/17/2018	WNL	CO	Review comments on draft of Report of Handwriting Expert	0.10	850.00	\$85.00
05/17/2018	WNL	CO	Review and analyze revised draft of Brief Regarding Further Evidence Re; Motion To Disallow claims.	0.70	850.00	\$595.00
05/17/2018	WNL	CO	Review correspondence re: Supplemental Brief.	0.10	850.00	\$85.00
05/17/2018	WNL	CO	Review revised Report of Handwriting Expert.	0.10	850.00	\$85.00
05/17/2018	WNL	CO	Further review and analysis of revised draft of Report of Handwriting Expert.	0.40	850.00	\$340.00
05/17/2018	TCF	CO	Research regarding Motion to Strike.	2.20	650.00	\$1,430.00
05/17/2018	TCF	CO	Review and revise supplement to Motion to Strike.	1.20	650.00	\$780.00
05/17/2018	TCF	CO	Draft declarations in support of supplement to Motion to Strike.	1.80	650.00	\$1,170.00
05/17/2018	TCF	CO	Telephone conference with A. Friedman regarding supplement to Motion to Strike.	0.20	650.00	\$130.00
05/17/2018	TCF	CO	Preparation and revisions to Williams Declaration in support of supplement to Motion to Strike.	1.00	650.00	\$650.00
05/17/2018	NPL	CO	Telephone call with L. Gauthier regarding supplement to Motion to Strike Beitler Parties proofs of claim.	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/17/2018	NPL	CO	Draft email to W. Lobel regarding professional fees associated with supplement to Motion to Strike Beitler Parties proofs of claim.	0.10	250.00	\$25.00
05/17/2018	NPL	CO	Review Williams letter regarding handwriting analysis in support of Supplement to Motion to Strike Beitler Parties proofs of claim.	0.10	250.00	\$25.00
05/17/2018	NPL	CO	Review draft declaration of W. Lobel regarding professional fees associated with Supplement to Motion to Strike Beitler Parties proofs of claim.	0.10	250.00	\$25.00
05/17/2018	NPL	CO	Attention to the analysis of professional fees related to Supplement to Motion to Strike Beitler Parties proofs of claim.	1.30	250.00	\$325.00
05/17/2018	NPL	CO	Telephone call with W. Lobel regarding professional fee associated with Supplement to Motion to Strike Beitler Partes claims.	0.30	250.00	\$75.00
05/17/2018	NPL	CO	Draft email to A. Friedman regarding professional fees associated with Supplement to Motion to Strike Beitler Parties claims.	0.10	250.00	\$25.00
05/17/2018	NPL	CO	Draft email to T. Flanagan regarding time-entries for professional fees to Supplement to Motion to Strike claims; revise same.	0.40	250.00	\$100.00
05/17/2018	NPL	CO	Revise declaration of W. Lobel regarding Supplement to Motion to Strike Beitler Parties proofs of claim.	0.20	250.00	\$50.00
05/17/2018	NPL	CO	Review emails regarding Williams declaration regarding Supplement to Motion to Strike Beitler Parties proofs of claim.	0.10	250.00	\$25.00
05/18/2018	WNL	CO	Conference call with A. Friedman, s. O'Keefe, T. Flanagan and A. Meislik re: issues and strategy re: forgery and discovery issues.	0.80	850.00	\$680.00
05/18/2018	WNL	CO	Review and analyze report of handwriting expert and comments thereto.	0.30	850.00	\$255.00
05/18/2018	WNL	CO	Review and analyze draft Brief re: Supplemental Evidence.	0.90	850.00	\$765.00
05/18/2018	WNL	CO	Review and analyze draft of Report of Handwriting Expert.	0.30	850.00	\$255.00
05/18/2018	WNL	CO	Telephone call with A. Friedman re: Reply to Objections to Disclosure Statement.	0.20	850.00	\$170.00
05/18/2018	WNL	CO	Telephone call with R. Williams re: handwriting analysis.	0.30	850.00	\$255.00
05/18/2018	WNL	CO	Review correspondence re: draft Report of Handwriting Expert.	0.20	850.00	\$170.00
05/18/2018	WNL	CO	Review latest draft of Brief in Support of Further Evidence.	0.70	850.00	\$595.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/18/2018	WNL	CO	Review draft version of Brief re: Supplemental Evidence.	0.70	850.00	\$595.00
05/18/2018	WNL	CO	Review draft of Declaration of W. Lobel re: amount of PSZJ's fees in connection with Motion to Strike Claims.	0.20	850.00	\$170.00
05/18/2018	WNL	CO	Review billings and segregate fees applicable to Motion to Strike.	1.60	850.00	\$1,360.00
05/18/2018	TCF	CO	Review and revise expert declaration in support of Motion to Strike.	0.20	650.00	\$130.00
05/18/2018	TCF	CO	Correspondence G. Pemberton regarding expert declaration in support of Motion to Strike.	0.10	650.00	\$65.00
05/18/2018	NPL	CO	Continued analysis of professional fees related to Motion to Strike.	1.40	250.00	\$350.00
05/18/2018	NPL	CO	Revise declaration of W. Lobel regarding Supplement to Motion to Strike claims; forward same to W. Lobel for review.	0.30	250.00	\$75.00
05/18/2018	NPL	CO	Draft email to L. Gauthier regarding Supplement to Motion to Strike claims.	0.10	250.00	\$25.00
05/18/2018	NPL	CO	Review and reply to email from L. Gauthier regarding status of Supplement to Motion to Strike claims.	0.10	250.00	\$25.00
05/18/2018	SAO	CO	Review and revise Supplement to Motion to Strike claims to address court's power to review initials and reach its own conclusion re forgeries.	1.50	750.00	\$1,125.00
05/21/2018	WNL	CO	Review correspondence re: request for attorney's fees in connection with the Motion to Strike claims.	0.20	850.00	\$170.00
05/21/2018	WNL	CO	Review final version of report from handwriting expert.	0.20	850.00	\$170.00
05/21/2018	WNL	CO	Review additional correspondence re: Document Examination Report.	0.10	850.00	\$85.00
05/21/2018	WNL	CO	Review additional correspondnce re: handwriting expert's report.	0.10	850.00	\$85.00
05/21/2018	WNL	CO	Telephone call with A. Friedman re: discovery and related issues.	0.20	850.00	\$170.00
05/21/2018	WNL	CO	Review Requests for Production of Documents.	0.20	850.00	\$170.00
05/21/2018	WNL	CO	Review and analyze Motion to Compel Supplemental Responses tp Discovery and supporting Declarations and Exhibits.	0.60	850.00	\$510.00
05/21/2018	WNL	CO	Review correspondence re: Report of Handwriting Expert.	0.20	850.00	\$170.00
05/21/2018	WNL	CO	Analyze issues and strategy concerning discovery and evidentiary issues.	0.80	850.00	\$680.00
05/22/2018	WNL	CO	Telephone call with A. Friedman re: handwriting	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			analysis issues.			
05/22/2018	WNL	CO	Review correspondence re: communication with handwriting expert.	0.10	850.00	\$85.00
05/22/2018	WNL	CO	Review additional correspondence re: Report of Handwriting Expert.	0.30	850.00	\$255.00
05/22/2018	WNL	CO	Telephone call with Ron Williams re: handwriting expert and report.	0.20	850.00	\$170.00
05/22/2018	WNL	CO	Review additional correspondence re: handwriting analysis.	0.20	850.00	\$170.00
05/22/2018	WNL	CO	Review correspondence re: Report of Handwriting Expert.	0.10	850.00	\$85.00
05/22/2018	WNL	CO	Review additional correspondence re: Handwriting report.	0.10	850.00	\$85.00
05/22/2018	WNL	CO	Review Declaration of R. Williams.	0.10	850.00	\$85.00
05/22/2018	WNL	CO	Review revised requests for production of documents.	0.40	850.00	\$340.00
05/22/2018	WNL	CO	Review initial draft of R. Williams Declaration.	0.10	850.00	\$85.00
05/22/2018	WNL	CO	Review comments to draft Report of Handwriting Expert.	0.10	850.00	\$85.00
05/22/2018	WNL	CO	Review request for extension of time to respond to propounded discovery.	0.10	850.00	\$85.00
05/22/2018	WNL	CO	Review and analyze draft Reoprt of Handwriting Expert.	0.20	850.00	\$170.00
05/22/2018	WNL	CO	Review and comment on Motion to Compel Supplemental Responses to Discovery.	0.60	850.00	\$510.00
05/23/2018	WNL	CO	Telephone calls with A. Friedman re: forgery and perjury issues	0.30	850.00	\$255.00
05/23/2018	WNL	CO	Review final version of report of handwriting expert and supporting declaration.	0.20	850.00	\$170.00
05/23/2018	WNL	CO	Review correspondence re: objection to claim 7.	0.10	850.00	\$85.00
05/23/2018	WNL	CO	Review final version of Brief Regarding Further Evidence Seeking Disallowance of Claims.	0.80	850.00	\$680.00
05/23/2018	WNL	CO	Review correspondence re: handwriting report issues.	0.10	850.00	\$85.00
05/23/2018	WNL	CO	Review and respond to correspondence re: finalization of Report of Handwriting Expert.	0.10	850.00	\$85.00
05/23/2018	WNL	CO	Review additional correspondence re: basis for claim objection.	0.10	850.00	\$85.00
05/23/2018	WNL	CO	Review correspondence re: Supplemental Brief.	0.10	850.00	\$85.00
05/23/2018	WNL	CO	Review correspondence re: revisions to Supplemental Brief.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/23/2018	SAO	CO	Revise Supplement to Motion to Strike claims incorporating evidence re Beitler's forging of initials on Altered OPA.	1.10	750.00	\$825.00
05/24/2018	WNL	CO	Review and revise Declaration of W. Lobel in support of Brief in Support of Supplemental Evidence.	0.20	850.00	\$170.00
05/24/2018	WNL	CO	Review correspondence re: finalization of Brief.	0.20	850.00	\$170.00
05/24/2018	WNL	CO	Review final version of Brief re: Further Evidence in Support of Motion to Disallow Claims.	0.40	850.00	\$340.00
05/24/2018	WNL	CO	Review additional correspondence re: Brief in Support of Motion.	0.10	850.00	\$85.00
05/24/2018	WNL	CO	Review draft Stipulation Continuing Hearing and Response Date re: Motion to Compel Supplemental Responses to Discovery.	0.10	850.00	\$85.00
05/24/2018	WNL	CO	Review additional correspondence re: finalization of Brief.	0.10	850.00	\$85.00
05/24/2018	WNL	CO	Review correspondence re: final changes to Supplemental Brief.	0.10	850.00	\$85.00
05/24/2018	WNL	CO	Review additional correspondence re: Brief.	0.10	850.00	\$85.00
05/24/2018	WNL	CO	Review Declaration of L. Gauthier in Support of Brief.	0.10	850.00	\$85.00
05/24/2018	WNL	CO	Review additional correspondence re: Declaration of W. Lobel.	0.10	850.00	\$85.00
05/24/2018	WNL	CO	Review correspondence re: Stipulation continuing hearing and response date re: Motion to Compel Responses to Discovery.	0.10	850.00	\$85.00
05/24/2018	WNL	CO	Review correspondence re: Declaration of Ron Williams and related documents.	0.10	850.00	\$85.00
05/24/2018	WNL	CO	Review additional correspondence re: Supplemental Brief.	0.10	850.00	\$85.00
05/24/2018	WNL	CO	Review and respond to correspondence re: Stipulation continuing hearing.	0.10	850.00	\$85.00
05/24/2018	WNL	CO	Review and execute revised Stipulation re: continuance of hearing.	0.10	850.00	\$85.00
05/24/2018	WNL	CO	Review Further Responses to Requests for Admission.	0.30	850.00	\$255.00
05/24/2018	WNL	CO	Review three new claims just filed.	0.10	850.00	\$85.00
05/24/2018	WNL	CO	Review and analyze updated privilege logs.	0.20	850.00	\$170.00
05/24/2018	TCF	CO	Review and analysis of issues regarding Supplemental Motion to Strike.	0.20	650.00	\$130.00
05/25/2018	WNL	CO	Review correspondence re: claims not filed by extended deadline.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/25/2018	WNL	CO	Review correspondence re: stipulation requesting continuance of hearing on Motion to Compel.	0.10	850.00	\$85.00
05/25/2018	WNL	CO	Review correspondence re: Supplemental bar date and new claims being filed.	0.10	850.00	\$85.00
05/25/2018	WNL	CO	Review correspondence and analyze issues re: claims objections.	0.40	850.00	\$340.00
05/25/2018	WNL	CO	Review and analyze issues and potential defenses to objections to Beitler claims.	0.70	850.00	\$595.00
05/25/2018	TCF	CO	Review and analysis of issues regarding Supplemental bar date and contingent claims.	0.10	650.00	\$65.00
05/25/2018	TCF	CO	Review and analysis of new and amended claims filed by Beitler Parties.	0.10	650.00	\$65.00
05/29/2018	WNL	CO	Review and analyze Beitler Reply re: Brief in Support on Motion to Disallow Claims.	0.40	850.00	\$340.00
05/30/2018	WNL	CO	Review subpoena to be served on Don Rezak.	0.10	850.00	\$85.00
05/30/2018	WNL	CO	Review Beitler's Further Responses to Requests for Admission.	0.20	850.00	\$170.00
05/30/2018	WNL	CO	Review Order re: Motion to Compel Supplemental Responses to Discovery.	0.10	850.00	\$85.00
05/30/2018	WNL	CO	Review Beitler Reply to Brief Re: Further Evidence in Support of Motion to Disallow Claims.	0.10	850.00	\$85.00
05/30/2018	SAO	CO	Conference call with A. Friedman and W. Lobel re timing of hearing on Motion to Strike claims and discovery required to be completed before hearing.	0.40	750.00	\$300.00
05/31/2018	WNL	CO	Review and analyze correspondence re: possible subordination of claims.	0.30	850.00	\$255.00
05/31/2018	WNL	CO	Review correspondence re: possible equitable subordination of Beitler claims.	0.20	850.00	\$170.00
05/31/2018	TCF	CO	Telephone conferences with A. Friedman regarding claim issues and research.	0.10	650.00	\$65.00
05/31/2018	TCF	CO	Legal research regarding claim and grounds for disallowance.	2.00	650.00	\$1,300.00
05/31/2018	TCF	CO	All-hands conference call regarding 5/31 disclosure statement hearing, amended plan and disclosure statement; Motion to Strike and Supplemental briefing; go-forward issues and plan.	0.80	650.00	\$520.00
05/31/2018	TCF	CO	Correspondence with A. Friedman regarding disclosure statement hearing.	0.10	650.00	\$65.00
				110.50		\$73,555.00

Fee/Employment Application

05/03/2018	WNL	FE	Review engagement letter and related	0.10	850.00	\$85.00
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			correspondence re: handwriting expert.			
05/08/2018	WNL	FE	Review limited objection to the employment of Force 10.	0.10	850.00	\$85.00
05/14/2018	WNL	FE	Review order approving employment of Force 10 and telephone call re: same.	0.10	850.00	\$85.00
05/14/2018	WNL	FE	Telephone call with and draft correspondence to John Bral.	0.20	850.00	\$170.00
				0.50		\$425.00

Fees of Professionals

05/17/2018	NPL	FP	Review and revise April 2018 pre-bill.	1.30	250.00	\$325.00
05/18/2018	NPL	FP	Analysis of Professional Fees	2.70	250.00	\$675.00
				4.00		\$1,000.00

Litigation (Non-Bankruptcy)

05/02/2018	WNL	LN	Review correspondence re: capital account issues.	0.20	850.00	\$170.00
05/02/2018	WNL	LN	Review additional correspondence re: capital account analysis.	0.20	850.00	\$170.00
05/02/2018	WNL	LN	Review draft memo to John Bral.	0.20	850.00	\$170.00
05/08/2018	WNL	LN	Review correspondence re: Westcliff arbitration.	0.20	850.00	\$170.00
05/17/2018	WNL	LN	Review correspondence re: state court litigation issues.	0.10	850.00	\$85.00
05/18/2018	WNL	LN	Review minute order in state court litigation.	0.10	850.00	\$85.00
05/21/2018	WNL	LN	Review and analyze arbitration issues and related timing and strategy.	0.30	850.00	\$255.00
				1.30		\$1,105.00

Plan & Disclosure Stmt. [B320]

04/30/2018	NPL	PD	Review and reply to email from L. Gauthier regarding amended disclosure statement.	0.10	250.00	\$25.00
04/30/2018	NPL	PD	Review multiple emails from A. Friedman, A. Meislik, W. Lobel and L. Gauthier regarding updated and revised amended disclosure statement.	0.30	250.00	\$75.00
05/01/2018	WNL	PD	Review and analyze language of revised Disclosure Statement and issues raised thereby.	2.60	850.00	\$2,210.00
05/01/2018	WNL	PD	Review correspondence re: revised Disclosure Statement.	0.10	850.00	\$85.00
05/01/2018	WNL	PD	Review comments to revised Disclosure Statement and consider issues raised thereby.	0.30	850.00	\$255.00
05/01/2018	WNL	PD	Review Declaration Pof S. Ptyl in Support of	0.10	850.00	\$85.00

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			Disclosure Statement.			
05/01/2018	WNL	PD	Review and analyze draft Declaration of Adam Meislik in Support of Disclosure Statement and attached Exhibits.	2.10	850.00	\$1,785.00
05/01/2018	WNL	PD	Review draft First Amended Chapter 11 Plan.	1.70	850.00	\$1,445.00
05/01/2018	TCF	PD	Correspond with A. Friedman regarding reply to Opposition to Approval of Disclosure Statement.	0.10	650.00	\$65.00
05/01/2018	TCF	PD	Correspond with S. O'Keefe regarding disclosure statement and class matters.	0.10	650.00	\$65.00
05/01/2018	NPL	PD	Review multiple emails regarding amended Disclosure Statement; attention to dates and deadlines regarding same.	0.20	250.00	\$50.00
05/02/2018	WNL	PD	Analyze potential confirmation issues and alternative courses of action.	1.40	850.00	\$1,190.00
05/04/2018	WNL	PD	Conference call with A. Friedman, S. O'Keefe and T. Flanagan re: Court's comments re: Supplement to Disclosure Statement and related issues.	1.20	850.00	\$1,020.00
05/04/2018	WNL	PD	Review correspondence re: continued deposition date for John Bral.	0.10	850.00	\$85.00
05/04/2018	WNL	PD	Review relevant documents and related correspondence re: Bral claims against Barry Beitler.	0.30	850.00	\$255.00
05/04/2018	TCF	PD	Telephone conference with A. Friedman regarding Disclosure Statement and Plan issues and Court's Order regarding additional information regarding assets, valuation in support of Disclosure Statement.	0.40	650.00	\$260.00
05/04/2018	TCF	PD	Conference call with team regarding plan structure and Disclosure Statement issues.	1.30	650.00	\$845.00
05/04/2018	SAO	PD	Conference call with A. Friedman, T. Flanagan, and W. Lobel re Plan of reorganization revisions and confirmation issues; discovery issues re Motion to Strike; draft of order re crime fraud exception; and related case issues.	1.10	750.00	\$825.00
05/05/2018	WNL	PD	Review revised chart of assets to be retained or liquidated.	0.20	850.00	\$170.00
05/05/2018	TCF	PD	Draft schedule of assets and valuation; issues and claims.	2.90	650.00	\$1,885.00
05/05/2018	TCF	PD	Correspondence with team regarding schedule of assets and valuations.	0.10	650.00	\$65.00
05/07/2018	WNL	PD	Review correspondence re: exclusivity deadline to solicit votes.	0.10	850.00	\$85.00
05/07/2018	WNL	PD	Review correspondence and chart re: assets to be retained and assets to be sold under the plan.	0.20	850.00	\$170.00
05/07/2018	WNL	PD	Review initial draft of summary of assets to be sold, and to be retained.	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/07/2018	WNL	PD	Review and analyze confirmation and claims issues.	0.60	850.00	\$510.00
05/07/2018	TCF	PD	Review and analysis of Disclosure Statement and asset valuation issues.	0.40	650.00	\$260.00
05/07/2018	TCF	PD	Review and revise asset chart.	0.20	650.00	\$130.00
05/07/2018	TCF	PD	Correspondence regarding asset chart.	0.10	650.00	\$65.00
05/08/2018	WNL	PD	Telephone call with A. Friedman re: issues concerning Amended Plan and court ordered Supplement to Amended Disclosure Statement.	0.20	850.00	\$170.00
05/08/2018	WNL	PD	Review and revise schedule of assets to be liquidated and assets to be retained by the Debtor under the Amended Plan.	0.50	850.00	\$425.00
05/08/2018	WNL	PD	Telephone call with A. Friedman and add language to Schedule of assets to be liquidated/retained by the Debtor.	0.20	850.00	\$170.00
05/08/2018	WNL	PD	Review preliminary chart of assets to be retained and assets to be sold and related correspondence.	0.30	850.00	\$255.00
05/08/2018	WNL	PD	Review revised chart of assets to be sold and/or retained and related correspondence.	0.20	850.00	\$170.00
05/08/2018	WNL	PD	Analyze potential objections to Disclosure Statement.	0.80	850.00	\$680.00
05/09/2018	WNL	PD	Review revised chart of claims to be attached to Disclosure Statement.	0.40	850.00	\$340.00
05/09/2018	TCF	PD	Revise asset and valuation schedule.	0.20	650.00	\$130.00
05/09/2018	TCF	PD	Correspondence regarding Disclosure Statement and Plan issues.	0.10	650.00	\$65.00
05/09/2018	NPL	PD	Review and reply to email from L. Gauthier regarding Supplement to Amended Disclosure Statement.	0.10	250.00	\$25.00
05/09/2018	NPL	PD	Telephone call with L. Gauthier regarding Supplement to amended disclosure statement.	0.10	250.00	\$25.00
05/09/2018	NPL	PD	Telephone call with W. Lobel regarding Supplement to Amended Disclosure Statement.	0.10	250.00	\$25.00
05/09/2018	NPL	PD	Prepare Supplement to Amended Disclosure Statement incorporating in T. Flanagan's revisions; draft email to L. Gauthier regarding same.	0.80	250.00	\$200.00
05/09/2018	NPL	PD	Finalize Supplement to Amended Disclosure Statement.	0.40	250.00	\$100.00
05/09/2018	NPL	PD	Draft email to T. Lallas regarding Supplement to amended disclosure statement.	0.10	250.00	\$25.00
05/10/2018	WNL	PD	Review and analyze revised chart for Disclosure Statement and related correspondence.	0.40	850.00	\$340.00
05/10/2018	WNL	PD	Review and analyze confirmation issues and	0.90	850.00	\$765.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			potential responses to objections to confirmation.			
05/11/2018	WNL	PD	Review final version of Supplement to Disclosure Statement.	0.10	850.00	\$85.00
05/13/2018	TCF	PD	Review and analysis of issues, and research regarding, plan confirmation issues.	1.20	650.00	\$780.00
05/16/2018	WNL	PD	Review and analyze issues and possible structures of Plan and treatment of creditors.	0.60	850.00	\$510.00
05/17/2018	WNL	PD	Review and analyze Beitlker's Objections to Disclosure Statement.	1.40	850.00	\$1,190.00
05/17/2018	WNL	PD	Review and analyze issues re: timing and substance of Plan and Disclosure Statement issues.	1.40	850.00	\$1,190.00
05/17/2018	TCF	PD	Telephone conference with A. Friedman regarding disclosure statement issues.	0.20	650.00	\$130.00
05/18/2018	WNL	PD	Conference call with A. Friedman, S.O'Keefe, T. Flanagan and A. Meislik re: objections to Disclosure Statement and Plan structure issues.	0.90	850.00	\$765.00
05/18/2018	WNL	PD	Review correspondence re: Beitler's Objection to Disclosure Statement.	0.10	850.00	\$85.00
05/18/2018	TCF	PD	All-hands call regarding Beitler Parties' objections to Disclosure Statement and response thereto.	1.90	650.00	\$1,235.00
05/18/2018	TCF	PD	Review and analysis of Beitler Parties' objections to Disclosure Statement.	0.40	650.00	\$260.00
05/18/2018	SAO	PD	Conference call re objections to Disclosure and resolving possible 1129 issues raised in objections.	1.00	750.00	\$750.00
05/19/2018	TCF	PD	Draft reply to Disclosure Statement objections.	8.20	650.00	\$5,330.00
05/20/2018	TCF	PD	Research and drafting of reply to Disclosure Statement objections.	10.40	650.00	\$6,760.00
05/21/2018	WNL	PD	Review and comment on draft Reply to Objections to Disclosure Statement.	1.70	850.00	\$1,445.00
05/21/2018	WNL	PD	Analyze issues concerning current structure and of Plan and language of Disclosure Statement.	1.60	850.00	\$1,360.00
05/21/2018	TCF	PD	Research and drafting of reply to Disclosure Statement Objections.	12.20	650.00	\$7,930.00
05/21/2018	SAO	PD	Revise response to Ojection to Disclosure Statement.	1.90	750.00	\$1,425.00
05/22/2018	WNL	PD	Review correspondence re: In re: Hanna.and issues concerning retention of property.	0.10	850.00	\$85.00
05/22/2018	WNL	PD	Review BAP decision in In re: Hanna.	0.30	850.00	\$255.00
05/22/2018	WNL	PD	Review and analyze comments to latest draft of Plan.	0.20	850.00	\$170.00
05/22/2018	WNL	PD	Review correspondence re: Declaration of A. Meislik Re; Response to Opposition to Disclosure Statement.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/22/2018	WNL	PD	Review correspondnce re: best interest test in Disclosure Statement.	0.10	850.00	\$85.00
05/22/2018	WNL	PD	Review correspondence re: pleadings and supporting documents to be filed today.	0.10	850.00	\$85.00
05/22/2018	WNL	PD	Telephone call with A. Friedman re: Response to Objections to Disclosure Statement.	0.30	850.00	\$255.00
05/22/2018	WNL	PD	Review correspondence re: Declaration of A. Meislik in support of Reply to Objections to disclosure Statement.	0.10	850.00	\$85.00
05/22/2018	WNL	PD	Review correspondence re: information to be included in revised Disclosure Statement.	0.20	850.00	\$170.00
05/22/2018	WNL	PD	Review correspondence re: additional information needed for Declaration of A. Meislik.	0.20	850.00	\$170.00
05/22/2018	WNL	PD	Review correspondence re: Supplemental Brief.	0.10	850.00	\$85.00
05/22/2018	WNL	PD	Review correspondence re: Declaration of A. Meislik.	0.20	850.00	\$170.00
05/22/2018	WNL	PD	Review correspondence re: order of sales of assets in the Plan.	0.10	850.00	\$85.00
05/22/2018	WNL	PD	Review comments to draft Reply to Objections to Disclosure Statement.	0.20	850.00	\$170.00
05/22/2018	WNL	PD	Review correspondence re: statements in Disclosure Statement.	0.10	850.00	\$85.00
05/22/2018	WNL	PD	Review comments to draft Reply to Objections to Disclosure Statement.	0.10	850.00	\$85.00
05/22/2018	WNL	PD	Review additional correspondence re: changes to Declaration of A. Meislik.	0.10	850.00	\$85.00
05/22/2018	WNL	PD	Review and analyze Plan and Disclosure Statement in view of Objections to Disclosure Statement filed by Beitler.	1.60	850.00	\$1,360.00
05/22/2018	TCF	PD	Draft Disclosure Statement reply; legal research regarding plan issues.	4.20	650.00	\$2,730.00
05/22/2018	TCF	PD	Telephone conference with A. Friedman regarding Plan issues, Disclosure Statement reply.	0.20	650.00	\$130.00
05/23/2018	WNL	PD	Review and analyze revised Declaration of Adam Meislik and Exhibits thereto.	0.40	850.00	\$340.00
05/23/2018	WNL	PD	Review additional correspondence re: Adam Meislik Declaration.	0.10	850.00	\$85.00
05/23/2018	WNL	PD	Review additional correspondence re: changes needed to Declaration of Adam Meislik.	0.20	850.00	\$170.00
05/23/2018	WNL	PD	Review correspondence re: disposable income issues.	0.20	850.00	\$170.00
05/23/2018	WNL	PD	Review various correspondence re: Reply to Objections to Disclosure Statement.	0.40	850.00	\$340.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/23/2018	WNL	PD	Telephone call with A. Friedman and S. O'Keefe re: Reply to objections to Disclosure Statement and issues concerning Effective Date of the Plan.	0.80	850.00	\$680.00
05/23/2018	WNL	PD	Review and analyze proposed new language re: definition of Effective Date and related provisions.	0.20	850.00	\$170.00
05/23/2018	WNL	PD	Review comments to proposed new language defined Effective Date.	0.10	850.00	\$85.00
05/23/2018	WNL	PD	Review correspondence re: timing of arbitrations versus Effective Date or Confirmation Date.	0.10	850.00	\$85.00
05/23/2018	WNL	PD	Telephone call with A. Friedman re: timing of arbitrations under Plan.	0.10	850.00	\$85.00
05/23/2018	WNL	PD	Review correspondence re: disposable income issues.	0.10	850.00	\$85.00
05/23/2018	WNL	PD	Review correspondence re: timing issues.	0.10	850.00	\$85.00
05/23/2018	WNL	PD	Review revised Reply to Objections to Disclosure Statement.	0.40	850.00	\$340.00
05/23/2018	WNL	PD	Review additional correspondence re: timing issues.	0.10	850.00	\$85.00
05/23/2018	WNL	PD	Review draft of A. Meislik Declaration.	0.10	850.00	\$85.00
05/23/2018	TCF	PD	Research and drafting of Disclosure Statement Reply and declarations in support thereof.	3.60	650.00	\$2,340.00
05/23/2018	TCF	PD	Communications with financial advisor regarding Plan issues, Disclosure Statement reply and Declaration in support thereof.	0.20	650.00	\$130.00
05/23/2018	TCF	PD	Correspond with W. Lobel regarding plan issues, disclosure statement reply.	0.10	650.00	\$65.00
05/23/2018	SAO	PD	Review plan provisions prior to call with W. Lobel and A. Friedman re effective date issues.	0.30	750.00	\$225.00
05/23/2018	SAO	PD	Review Plan provisions and draft revisions to Effective Date definitions; add Motion to Strike definitions; revise provision re timing of arbitrations.	1.00	750.00	\$750.00
05/24/2018	WNL	PD	Review correspondence re: revised Declaration of A. Meislik.	0.20	850.00	\$170.00
05/24/2018	WNL	PD	Review correspondence re: timing of resumption of arbitrations.	0.10	850.00	\$85.00
05/24/2018	WNL	PD	Review additiponal correspondence re: finalization of Declaration of A. Meislik Declaration.	0.10	850.00	\$85.00
05/24/2018	WNL	PD	Review correspondence re: Reply to Objections to Disclosure Statemen.	0.10	850.00	\$85.00
05/24/2018	WNL	PD	Review promissory note re: money owed to Michelle Easton.	0.10	850.00	\$85.00
05/24/2018	WNL	PD	Review correspondence re: security interest in favor of Michelle Easton.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/24/2018	WNL	PD	Review correspondence re: security interest in favor of Michelle Easton.	0.10	850.00	\$85.00
05/24/2018	WNL	PD	Review additional correspondence re: Reply to Objections to Disclosure Statement and related issues.	0.20	850.00	\$170.00
05/24/2018	WNL	PD	Review correspondence re: filing of several pleadings and supporting documents.	0.20	850.00	\$170.00
05/24/2018	WNL	PD	Review curriculum vitae of Ron Williams.	0.10	850.00	\$85.00
05/24/2018	TCF	PD	Review and revise reply to disclosure statement objections and declarations, finalize same.	2.60	650.00	\$1,690.00
05/24/2018	TCF	PD	Telephone conference with A. Friedman regarding reply to disclosure statement objections.	0.20	650.00	\$130.00
05/25/2018	WNL	PD	Review correspondence re: timing issues and preparation for pending hearing on Disclosure Statement.	0.10	850.00	\$85.00
05/25/2018	WNL	PD	Review and analyze issues re: claims issues and additional objections to claims.	0.80	850.00	\$680.00
05/25/2018	WNL	PD	Review and analyze confirmation issues.	0.70	850.00	\$595.00
05/28/2018	WNL	PD	Review latest iteration of Disclosure Statement and analyze confirmation and related issue, including potential objections to confirmation.	2.60	850.00	\$2,210.00
05/28/2018	TCF	PD	Review and analysis of preparation for hearing on approval of disclosure statement and Motion to Strike; correspond with W. Lobel and A. Friedman regarding same.	0.40	650.00	\$260.00
05/29/2018	WNL	PD	Telephone call with A. Friedman re: pending hearing on Disclosure Statement.	0.10	850.00	\$85.00
05/29/2018	WNL	PD	Review and analyze Plan, Disclosure Statement, Objections to Disclosure Statement, Reply and supporting Declarations.	2.60	850.00	\$2,210.00
05/30/2018	WNL	PD	Begin preparation for hearing on approval of Amended Disclosure Statement.	1.80	850.00	\$1,530.00
05/30/2018	WNL	PD	Confer with A. Friedman re: preparation for hearing on Amended Disclosure Statement.	2.60	850.00	\$2,210.00
05/30/2018	TCF	PD	Attend to Disclosure Statement hearing preparation.	0.40	650.00	\$260.00
05/30/2018	TCF	PD	Correspond with A. Friedman regarding Disclosure Statement hearing.	0.10	650.00	\$65.00
05/31/2018	WNL	PD	Review additional documents and prepare argument for pending hearing.	2.80	850.00	\$2,380.00
05/31/2018	WNL	PD	Attendance at hearing on adequacy of Disclosure Statement.	2.90	850.00	\$2,465.00
05/31/2018	WNL	PD	Confer with A. Friedman re: Plan, Disclosure Statement and related issues.	0.40	850.00	\$340.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/31/2018	WNL	PD	Conference call with A. Friedman, S. O'Keefe and T. Flanagan re:results of hearing on Disclosure Statement and action to be taken.	0.50	850.00	\$425.00
05/31/2018	WNL	PD	Review correspondence re: action to be taken.	0.10	850.00	\$85.00
05/31/2018	TCF	PD	Telephone conference with A. Friedman regarding disclosure statement issues.	0.20	650.00	\$130.00
05/31/2018	TCF	PD	Correspond with team regarding Disclosure Statement and hearing.	0.10	650.00	\$65.00
05/31/2018	SAO	PD	Conference call with A. Friedman, W. Lobel and T. Flanagan re results of hearing and going forward assignments required to complete case.	0.50	750.00	\$375.00
				110.50		\$81,485.00

Venue

05/29/2018	TCF	V	Revisions to motion to dismiss Steward first amended complaint.	0.70	650.00	\$455.00
				0.70		\$455.00

TOTAL SERVICES FOR THIS MATTER: **\$165,330.00**

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Expenses

05/03/2018	TE	Travel Expense [E110] Santa Ana Central Court, Parking Fee, WNL	14.00
05/04/2018	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
05/07/2018	OS	Secure Strategies International LLC, handwriting expert, WNL	2,000.00
05/09/2018	TR	Transcript [E116] Briggs Reporting Company, Inc. Inv. 19223, N. Lockwood	152.40
05/10/2018	PO	Postage [E108] Copy to Judge Chambers of Suppl to First Amended Disc. Statement, WNL	21.77
05/11/2018	PO	Postage [E108] Courtesy copy to Judges Chambers of Order Re Crime Fraud Brief, WNL	21.77
05/11/2018	RE2	SCAN/COPY (18 @0.10 PER PG)	1.80
05/11/2018	RE2	SCAN/COPY (18 @0.10 PER PG)	1.80
05/11/2018	RE2	SCAN/COPY (31 @0.10 PER PG)	3.10
05/31/2018	PAC	Pacer - Court Research	23.70
Total Expenses for this Matter			\$2,241.54

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REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For current services rendered through 06/13/2018

Total Fees	\$165,330.00
Chargeable costs and disbursements	\$2,241.54
Total Due on Current Invoice.....	\$167,571.54

Outstanding Balance from prior Invoices as of 05/31/2018 **(May not reflect recent payments)**

Invoice Number	Invoice Date	Fees Billed	Expenses Billed	Balance Due
118521	01/31/2018	\$64,977.50	\$1.40	\$64,978.90
118768	02/28/2018	\$89,105.00	\$6,717.72	\$95,822.72
119267	03/31/2018	\$170,795.00	\$818.42	\$171,613.42
119338	04/30/2018	\$241,285.00	\$12,901.06	\$254,186.06
Total Amount Due on Current and Prior Invoices				\$754,172.64

Pachulski Stang Ziehl & Jones LLP

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

June 30, 2018
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Client 10601
Matter 00001
WNL

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 06/30/2018

FEES	\$127,527.50
EXPENSES	\$476.66
TOTAL CURRENT CHARGES	\$128,004.16
BALANCE FORWARD	\$754,172.64
TOTAL BALANCE DUE	\$882,176.80

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	0.90	\$765.00
BO	Business Operations	1.20	\$1,020.00
CA	Case Administration [B110]	80.10	\$53,425.00
CO	Claims Admin/Objections[B310]	42.10	\$31,857.50
FE	Fee/Employment Application	0.10	\$85.00
FP	Fees of Professionals	0.40	\$100.00
LN	Litigation (Non-Bankruptcy)	6.90	\$4,725.00
PD	Plan & Disclosure Stmt. [B320]	50.20	\$35,550.00
		181.90	\$127,527.50

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
LAF	Forrester, Leslie A.	Other	395.00	0.50	\$197.50
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	18.00	\$4,500.00
SAOS	O'Keefe, Sean A	Counsel	750.00	18.60	\$13,950.00
TCF	Flanagan, Tavi C.	Counsel	650.00	71.00	\$46,150.00
WNL	Lobel, William N.	Partner	850.00	73.80	\$62,730.00
				181.90	\$127,527.50

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Auto Travel Expense [E109]	\$14.00
Conference Call [E105]	\$5.24
Filing Fee [E112]	\$8.25

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Lexis/Nexis- Legal Research [E	\$278.53
Outside Services	\$145.04
Pacer - Court Research	\$25.60
	<hr/> <hr/> \$476.66

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bankruptcy Litigation [L430]						
06/19/2018	WNL	BL	Review correspondence re: Court's tentative ruling.	0.10	850.00	\$85.00
06/20/2018	WNL	BL	Review additional correspondence re potential dismissal of 547 claim re: secured judgment.	0.10	850.00	\$85.00
06/21/2018	WNL	BL	Review and analyze BCRS and B. Beitler's Responses to Requests for Production of Documents.	0.40	850.00	\$340.00
06/21/2018	WNL	BL	Review correspondence re: draft Stipulation re: Bral's Motion to Compel responses to Discovery.	0.10	850.00	\$85.00
06/26/2018	WNL	BL	Review complaint and correspondence re: ADA lawsuit.	0.20	850.00	\$170.00
				0.90		\$765.00
Business Operations						
06/01/2018	WNL	BO	Review correspondence re: distributions from Westcliff.	0.10	850.00	\$85.00
06/05/2018	WNL	BO	Review correspondence re: distributions due to John Bral from Westcliff.	0.10	850.00	\$85.00
06/06/2018	WNL	BO	Review documentation supplied by John Bral to document his investment in Westcliff.	0.20	850.00	\$170.00
06/13/2018	WNL	BO	Review correspondence re: distributions from Westcliff.	0.20	850.00	\$170.00
06/14/2018	WNL	BO	Review correspondence re: distribution from Westcliff.	0.10	850.00	\$85.00
06/25/2018	WNL	BO	Review correspondence re: payment to Cannae on its judgment.	0.10	850.00	\$85.00
06/25/2018	WNL	BO	Review correspondence re: issues raised by distribution to Cannae.	0.10	850.00	\$85.00
06/25/2018	WNL	BO	Review correspondence re: distribution from Westcliff.	0.20	850.00	\$170.00
06/25/2018	WNL	BO	Review correspondence re: draft of letter to accompany distribution.	0.10	850.00	\$85.00
				1.20		\$1,020.00
Case Administration [B110]						
06/01/2018	TCF	CA	Correspond with A. Friedman regarding motion to convert chapter 11 case filed by Beitler Parties.	0.10	650.00	\$65.00
06/04/2018	NPL	CA	Review critical date and deadline memorandum; attention to dates and deadlines regarding same.	0.30	250.00	\$75.00
06/04/2018	NPL	CA	Review motion to dismiss or convert case to one under chapter 7 filed by Beitler; attention to dates	0.20	250.00	\$50.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			and deadlines regarding same.			
06/05/2018	NPL	CA	Confer with W. Lobel regarding status of filing and projected timeline; attention to dates and deadlines regarding same.	0.70	250.00	\$175.00
06/05/2018	TCF	CA	Research regarding motion to convert.	3.60	650.00	\$2,340.00
06/05/2018	TCF	CA	Telephone conference with A. Friedman regarding motion to convert.	0.20	650.00	\$130.00
06/06/2018	WNL	CA	Consider arguments relevant to Motion to Convert Chapter 11.	0.60	850.00	\$510.00
06/06/2018	NPL	CA	Review outstanding dates and deadlines for outstanding matters.	0.30	250.00	\$75.00
06/07/2018	WNL	CA	Review correspondence re: response to Motion to Convert..	0.10	850.00	\$85.00
06/07/2018	WNL	CA	Review correspondence re: hearing on Motion To Convert.	0.10	850.00	\$85.00
06/07/2018	NPL	CA	Review notice of motion to convert case; review dates and deadlines regarding same.	0.20	250.00	\$50.00
06/11/2018	TCF	CA	Research regarding motion to convert.	4.60	650.00	\$2,990.00
06/11/2018	TCF	CA	Correspondence with team regarding motion to convert.	0.10	650.00	\$65.00
06/11/2018	SAO	CA	Review motion to convert case to a Chapter 7 prior to conference call with A. Friedman and Tavi Flanagan.	0.30	750.00	\$225.00
06/11/2018	SAO	CA	Conference call with A. Friedman and T. Flanagan re preparation of response to motion to convert case.	0.30	750.00	\$225.00
06/12/2018	TCF	CA	Telephone conference with A. Friedman regarding motion to covert and response thereto.	0.80	650.00	\$520.00
06/12/2018	WNL	CA	Review updated summary of critical dates.	0.10	850.00	\$85.00
06/12/2018	WNL	CA	Analyze issues and potential response to Motion To Convert Chapter 11 To Chapter 7.	0.60	850.00	\$510.00
06/12/2018	WNL	CA	Analyze issues raised by Motion to Convert Case to Chapter 7.	0.30	850.00	\$255.00
06/12/2018	WNL	CA	Review correspondence re: administration of case.	0.20	850.00	\$170.00
06/12/2018	NPL	CA	Review critical date memorandum; attention to same.	0.60	250.00	\$150.00
06/13/2018	TCF	CA	Legal research and analysis regarding motion to convert.	4.80	650.00	\$3,120.00
06/13/2018	TCF	CA	Commence drafting points and authorities in support of opposition to motion to convert.	2.60	650.00	\$1,690.00
06/13/2018	WNL	CA	Review and analyze Motion to Convert Chapter 11 and consider responses thereto.	1.70	850.00	\$1,445.00
06/14/2018	TCF	CA	Draft opposition to motion to convert.	8.60	650.00	\$5,590.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/14/2018	WNL	CA	Formulate arguments against Motion to Convert Case to chapter 7.	0.90	850.00	\$765.00
06/14/2018	WNL	CA	Review and analyze cases relevant to Motion to Convert chapter 11.	1.60	850.00	\$1,360.00
06/15/2018	TCF	CA	Drafting of opposition to motion to convert.	6.80	650.00	\$4,420.00
06/15/2018	WNL	CA	Review monthly operating report for May, 2018.	0.10	850.00	\$85.00
06/18/2018	TCF	CA	Research and drafting of response to motion to convert case.	6.80	650.00	\$4,420.00
06/18/2018	TCF	CA	Communications with team regarding response to motion to convert case.	0.20	650.00	\$130.00
06/18/2018	WNL	CA	Review and comment on draft Opposition to Motion to Convert.	0.60	850.00	\$510.00
06/18/2018	WNL	CA	Telephone call with A. Friedman re: opposition to motion to convert.	0.20	850.00	\$170.00
06/18/2018	WNL	CA	Review additional correspondence re: draft opposition to Motion to Convert.	0.20	850.00	\$170.00
06/18/2018	WNL	CA	Review updated critical dates summary.	0.10	850.00	\$85.00
06/18/2018	WNL	CA	Review and analyze issues and possible additional arguments re: potential conversion of case to chapter 7.	0.60	850.00	\$510.00
06/18/2018	NPL	CA	Review and reply to email from L. Gauthier regarding critical date memorandum; attention to same.	0.30	250.00	\$75.00
06/18/2018	SAO	CA	Review and provide comments to opposition to motion to convert case to Chapter 7.	1.00	750.00	\$750.00
06/19/2018	TCF	CA	Review and analysis of issues relating to motion to convert case; correspondence with team regarding same.	0.40	650.00	\$260.00
06/19/2018	WNL	CA	Analyze issues and defenses re: conversion of case	0.40	850.00	\$340.00
06/19/2018	WNL	CA	Review correspondence re: issues involving possible conversion of chapter 11.	0.30	850.00	\$255.00
06/19/2018	WNL	CA	Telephone conference with A. Friedman re: legal test for conversion of a chapter 11 case.	0.20	850.00	\$170.00
06/19/2018	WNL	CA	Review and analyze issues argued in red-lined draft of Bral's Opposition to Motion to Convert.	0.90	850.00	\$765.00
06/19/2018	WNL	CA	Review and analyze arguments made in additional correspondence re: responses to Motion to Convert.	0.80	850.00	\$680.00
06/19/2018	WNL	CA	Review additional arguments re: defenses to conversion to chapter 7.	0.20	850.00	\$170.00
06/19/2018	WNL	CA	Analyze defenses to Motion to Convert and relevant legal issues.	0.40	850.00	\$340.00
06/19/2018	SAO	CA	Review emails and respond re issues and concerns	0.10	750.00	\$75.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			relating to motion to convert case.			
06/20/2018	TCF	CA	Telephone conference with N. Lockwood regarding opposition to motion to convert case.	0.10	650.00	\$65.00
06/20/2018	TCF	CA	Telephone conference with A. Friedman regarding opposition to motion to convert case.	0.40	650.00	\$260.00
06/20/2018	NPL	CA	Telephone call with T. Flanagan regarding evidentiary objections to declaration of G. Klausner.	0.10	250.00	\$25.00
06/21/2018	TCF	CA	Draft and revise opposition to conversion motion.	1.80	650.00	\$1,170.00
06/21/2018	TCF	CA	Research regarding opposition to conversion motion.	2.60	650.00	\$1,690.00
06/21/2018	WNL	CA	Review and comment on revised Opposition to Motion To Convert to Chapter 7.	0.80	850.00	\$680.00
06/22/2018	TCF	CA	Research and analysis regarding conversion issues.	0.60	650.00	\$390.00
06/22/2018	NPL	CA	Research TMT Procurement Corp. regarding outstanding issues in the Beitler parties motion to convert.	0.20	250.00	\$50.00
06/22/2018	NPL	CA	Prepare evidentiary objections to declaration of G. Klausner in support of Beitler parties motion to convert.	2.10	250.00	\$525.00
06/22/2018	NPL	CA	Draft email to T. Flanagan regarding evidentiary objections to G. Klausner's declaration in support of Beitler parties motion to convert.	0.10	250.00	\$25.00
06/23/2018	TCF	CA	Research and drafting of response to conversion motion.	0.60	650.00	\$390.00
06/25/2018	WNL	CA	Telephone call with A. Friedman re; responses to Motion to Convert chapter 11 and related issues.	0.60	850.00	\$510.00
06/25/2018	WNL	CA	Review correspondence re: response to Motion to Convert.	0.10	850.00	\$85.00
06/25/2018	WNL	CA	Telephone call with A. Friedman re: issues and strategy in responding to Motion to Convert.	0.40	850.00	\$340.00
06/25/2018	WNL	CA	Review and respond to correspondence re: timing of filing Response to Motion to Convert.	0.10	850.00	\$85.00
06/25/2018	WNL	CA	Review and analyze holding in the TMT Procurement case and related correspondence.	0.50	850.00	\$425.00
06/25/2018	WNL	CA	Review case and correspondence related thereto.	0.40	850.00	\$340.00
06/25/2018	NPL	CA	Review and reply to email from L. Gauthier regarding opposition to motion to convert case.	0.20	250.00	\$50.00
06/25/2018	NPL	CA	Review emails from A. Friedman and W. Lobel regarding filing documents for opposition to convert case.	0.10	250.00	\$25.00
06/26/2018	TCF	CA	Draft and revise response to motion to convert; research and analysis with respect thereto.	3.80	650.00	\$2,470.00
06/26/2018	TCF	CA	Draft and revise declarations in support of response	2.80	650.00	\$1,820.00

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			to motion to convert.			
06/26/2018	TCF	CA	Conference call with A. Friedman and W. Lobel regarding response to motion to convert.	0.40	650.00	\$260.00
06/26/2018	TCF	CA	Preparation and coordination with team regarding opposition to motion to convert and evidence in support.	1.20	650.00	\$780.00
06/26/2018	WNL	CA	Review and analyze latest draft of Opposition to Motion to Convert case.	0.50	850.00	\$425.00
06/26/2018	WNL	CA	Review correspondence re: Opposition to Motion to Convert.	0.20	850.00	\$170.00
06/26/2018	WNL	CA	Review additional changes to Reply to Motion to Convert.	0.20	850.00	\$170.00
06/26/2018	WNL	CA	Review declarations in support of Opposition to Motion to Convert.	0.30	850.00	\$255.00
06/26/2018	WNL	CA	Review Request For Judicial Notice in Support of Opposition to Motion to Convert.	0.10	850.00	\$85.00
06/26/2018	WNL	CA	Review revised declaration of Adam Meislik in Support of Opposition to Motion to Convert.	0.10	850.00	\$85.00
06/26/2018	WNL	CA	Review correspondence re: Exhibit A revisions.	0.10	850.00	\$85.00
06/26/2018	WNL	CA	Review additional correspondence re: language of A. Meislik declaration.	0.20	850.00	\$170.00
06/26/2018	WNL	CA	Review revised draft Declaration of Adam Meislik in support of opposition to Motion to Convert case.	0.30	850.00	\$255.00
06/26/2018	WNL	CA	Review draft of John Bral in support of Debtor's Opposition to Motion to Convert case.	0.10	850.00	\$85.00
06/26/2018	NPL	CA	Review and reply to email from L. Gauthier regarding request for judicial notice in support of opposition to motion to convert case.	0.10	250.00	\$25.00
06/27/2018	WNL	CA	Review evidentiary objections to Declaration of G. Klausner in Support of Motion to Convert.	0.40	850.00	\$340.00
06/27/2018	WNL	CA	Review correspondence re: timing of filing of Motion to Convert chapter 11.	0.10	850.00	\$85.00
06/27/2018	WNL	CA	Analyze arguments and legal precedent re: response to Motion to Convert.	0.80	850.00	\$680.00
06/28/2018	SAO	CA	Plan of action re final brief in motion to strike contested matter.	0.10	750.00	\$75.00
06/28/2018	WNL	CA	Review correspondence re: possible estoppel argument.	0.10	850.00	\$85.00
06/28/2018	TCF	CA	Review and analysis of motion to convert opposition issues and evidence in support.	0.40	650.00	\$260.00
06/28/2018	NPL	CA	Review and reply to email from L. Gauthier regarding opposition to motion to convert case; review pending pleading list regarding same.	0.30	250.00	\$75.00

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06/28/2018	WNL	CA	Review correspondence re: Opposition to Motion to Convert.	0.10	850.00	\$85.00
06/28/2018	SAO	CA	Conference call with A. Friedman re issues relating to motion to convert case.	0.20	750.00	\$150.00
06/29/2018	WNL	CA	Review additional correspondence re: evidentiary issues.	0.10	850.00	\$85.00
06/29/2018	NPL	CA	Review email from A. Friedman regarding motion to strike banker's declaration regarding motion to convert case.	0.10	250.00	\$25.00
06/29/2018	NPL	CA	Review email from S. O'Keefe regarding opposition to motion to convert case.	0.10	250.00	\$25.00
				80.10		\$53,425.00

Claims Admin/Objections[B310]

05/23/2018	SAO	CO	Confrence call with A. Friedman re strategy issues re supplement to motion to strike claims.	0.40	750.00	\$300.00
05/23/2018	SAO	CO	Conference call with A. Friedman and W. Lobel re required changes to plan, strategy issues re supplement to motion to strike claims.	0.40	750.00	\$300.00
06/01/2018	WNL	CO	Analyze issues and formulate strategy re: objections to claims.	0.60	850.00	\$510.00
06/03/2018	WNL	CO	Review and reply to correspondence re: claim objections	0.10	850.00	\$85.00
06/03/2018	WNL	CO	Telephone call with A. Friedman re: allegations of Beitler parties.	0.30	850.00	\$255.00
06/04/2018	NPL	CO	Review emails regarding objection to Beitler parties proofs of claim.	0.40	250.00	\$100.00
06/04/2018	NPL	CO	Review amended claim numbers 9 and 11 filed by Beitler.	0.20	250.00	\$50.00
06/04/2018	NPL	CO	Review claim number 23 filed by Beitler Associates.	0.10	250.00	\$25.00
06/04/2018	WNL	CO	Review amended and new proofs of claim.	0.30	850.00	\$255.00
06/04/2018	WNL	CO	Review and analyze Beitler Opposition to Motion to Compel Responses to Discovery.	1.40	850.00	\$1,190.00
06/04/2018	WNL	CO	Analyze factual and legal issues re: claims objections and consider countering evidence and arguments.	1.60	850.00	\$1,360.00
06/04/2018	NPL	CO	Review motion compelling supplemental discovery responses regarding B. Beitler and B. Boyd regarding claim objections.	0.20	250.00	\$50.00
06/04/2018	SAO	CO	Begin preparation of final brief re motion to strike proofs of claim.	0.30	750.00	\$225.00
06/04/2018	SAO	CO	Review and provide comments to opposition to	0.50	750.00	\$375.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			motion to convert case to Chapter 7.			
06/05/2018	WNL	CO	Review correspondence and telephone call with A. Friedman re: Beitler Parties query about communication with the Court.	0.20	850.00	\$170.00
06/05/2018	WNL	CO	Review language to be added to scheduling order re: motion to strike.	0.10	850.00	\$85.00
06/05/2018	NPL	CO	Review amended claims filed by the Beitler parties.	0.30	250.00	\$75.00
06/06/2018	WNL	CO	Telephone call with A. Friedman re: response to inquiry from G. Klausner.	0.10	850.00	\$85.00
06/06/2018	WNL	CO	Review and comment on proposed response to G. Klausner.	0.30	850.00	\$255.00
06/06/2018	WNL	CO	Review final version of response to G. Klausner.	0.10	850.00	\$85.00
06/07/2018	WNL	CO	Analyze issues and defenses re: objections to claims.	0.80	850.00	\$680.00
06/07/2018	NPL	CO	Review and revise declaration of W. Lobel regarding reply to crime fraud motion.	0.20	250.00	\$50.00
06/07/2018	NPL	CO	Review and reply to email from L. Gauthier regarding reply to crime-fraud brief.	0.10	250.00	\$25.00
06/07/2018	NPL	CO	Confer with W. Lobel regarding reply to crime-fraud brief.	0.10	250.00	\$25.00
06/08/2018	WNL	CO	Review entered Scheduling Order re: Motion to Strike Claims.	0.10	850.00	\$85.00
06/08/2018	WNL	CO	Analyze issues and defects in defenses raised by Beitler Parties re: Motion to Strike Claims.	0.80	850.00	\$680.00
06/08/2018	NPL	CO	Review entered scheduling order regarding claim objection to Beitler and Boyd; attention to dates and deadlines regarding same.	0.20	250.00	\$50.00
06/11/2018	SAO	CO	Preparation of final brief re motion to strike claims.	0.20	750.00	\$150.00
06/11/2018	WNL	CO	Review Debtor's Reply Brief Re; Motion For Order Compelling Responses To First Set Of requests For Admission and Request For Sanctions and Supporting Declaration.	0.50	850.00	\$425.00
06/11/2018	WNL	CO	Review evidentiary objections to Declaration of M. Hurwitz.	0.10	850.00	\$85.00
06/11/2018	WNL	CO	Analyze issues re: evidentiary objections.	0.20	850.00	\$170.00
06/11/2018	NPL	CO	Review and reply to email from L. Gauthier regarding reply brief and evidentiary objections in support of motion to compel; confer with W. Lobel regarding same.	0.40	250.00	\$100.00
06/11/2018	SAO	CO	Begin preparation of closing brief re motion to strike claims; summarization of all evidence.	1.10	750.00	\$825.00
06/12/2018	WNL	CO	Review and analyze potential arguments concerning Motion to Strike Claims.	0.70	850.00	\$595.00

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06/12/2018	WNL	CO	Anlyze claims issues.	0.40	850.00	\$340.00
06/12/2018	WNL	CO	Analyze arguments made by Beitler Parties.	0.70	850.00	\$595.00
06/12/2018	NPL	CO	Review transcript of hearing to motion to strike claims.	0.40	250.00	\$100.00
06/12/2018	SAO	CO	Review 5/18/2018 hearing transcript to ascertain court's perspective on issues prior to preparing final brief re motion to strike.	0.40	750.00	\$300.00
06/12/2018	SAO	CO	Prepare draft of reply re motion to strike in anticipation of opposition points that Beitler Parties will make.	1.50	750.00	\$1,125.00
06/13/2018	WNL	CO	Review Final Order re: Crime Fraud exception.	0.10	850.00	\$85.00
06/13/2018	WNL	CO	Review comments re: Order on Crime Fraud Exception.	0.10	850.00	\$85.00
06/13/2018	WNL	CO	Analyze issues concerning claims objections and related issues.	1.40	850.00	\$1,190.00
06/13/2018	WNL	CO	Analyze and consider evidentiary issues.	0.40	850.00	\$340.00
06/14/2018	WNL	CO	Analyze arguments being made in opposition to Bral's Motion to Strike Claims.	0.70	850.00	\$595.00
06/15/2018	WNL	CO	Telephone call re:A. Friedman re: mistake in Reply Brief.	0.10	850.00	\$85.00
06/15/2018	WNL	CO	Review and revise pleading in connection with mistake in prior pleading.	0.20	850.00	\$170.00
06/15/2018	WNL	CO	Second phone call with A.Friedman re: response to mistake in prior pleading.	0.20	850.00	\$170.00
06/15/2018	WNL	CO	Review additional comments on withdraw of argument in prior pleading	0.10	850.00	\$85.00
06/15/2018	WNL	CO	Review and respond to various correspondence re: Motion to Withdraw Argument.	0.20	850.00	\$170.00
06/15/2018	NPL	CO	Review and reply to email from L. Gauthier regarding withdrawal of portions of reply brief in support of motion compelling supplemental responses.	0.10	250.00	\$25.00
06/15/2018	NPL	CO	Coordinate comments and revisions of W. Lobel to withdrawal of portions of reply brief in support of motion compelling supplemental responses with L. Gauthier.	0.30	250.00	\$75.00
06/15/2018	NPL	CO	Review withdrawal of certain portions of reply to objection to motion to compel.	0.20	250.00	\$50.00
06/18/2018	WNL	CO	Review and analyze issues concerning potential defenses to objections to claims.	0.80	850.00	\$680.00
06/19/2018	SAO	CO	Continue preparation of final reply to Beitler's anticipated objections to motion to strike claims.	0.50	750.00	\$375.00

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06/20/2018	WNL	CO	Analyze appellate issues concerning 544 and 547 attacks on Beitler's secured claim.	0.30	850.00	\$255.00
06/20/2018	WNL	CO	Analyze issues and legal arguments re: basis for and defenses to our objections to claims.	0.70	850.00	\$595.00
06/20/2018	WNL	CO	Review correspondence and analyze evidentiary issues and objections.	0.40	850.00	\$340.00
06/21/2018	WNL	CO	Review Order Denying Motion To Compel Production of Documents.	0.10	850.00	\$85.00
06/21/2018	SAO	CO	Continue preparing findings of fact in support of final brief re motion to strike claims.	2.90	750.00	\$2,175.00
06/22/2018	LAF	CO	Legal research re: 1112(b) legislative history.	0.50	395.00	\$197.50
06/22/2018	WNL	CO	Review correspondence re: Stipulation re: Bral's Motion to Compel Discovery.	0.10	850.00	\$85.00
06/22/2018	SAO	CO	Continue preparing table of facts for final reply brief re motion to strike.	0.40	750.00	\$300.00
06/23/2018	SAO	CO	Draft proposed findings of fact and conclusion of law in support of motion to strike claims.	6.00	750.00	\$4,500.00
06/25/2018	WNL	CO	Review draft of Proposed Findings of Fact re; hearing on Motion to Strike and application of crime fraud exception.	0.30	850.00	\$255.00
06/25/2018	WNL	CO	Review Beitler's Responses to Document Requests.	0.30	850.00	\$255.00
06/25/2018	SAO	CO	Continue preparing statement of undisputed facts and conclusions of law in support of motion to strike claims.	0.50	750.00	\$375.00
06/26/2018	WNL	CO	Review Stipulation Compelling Responses to Discovery.	0.20	850.00	\$170.00
06/26/2018	NPL	CO	Review email from L. Gauthier regarding joint stipulation regarding motion for order compelling supplemental discovery responses.	0.10	250.00	\$25.00
06/26/2018	NPL	CO	Review stipulation regarding parties' resolution of Bral's motion for order compelling supplemental discovery responses.	0.10	250.00	\$25.00
06/26/2018	SAO	CO	Continue preparing statement of facts and conclusions of law in support of final brief re motion to strike claims.	1.50	750.00	\$1,125.00
06/27/2018	WNL	CO	Analyze arguments re: opposition to Motion to Strike Claims.	0.70	850.00	\$595.00
06/27/2018	WNL	CO	Review correspondence and analyze issues re: objections to claims.	0.40	850.00	\$340.00
06/28/2018	WNL	CO	Review correspondence re: evidentiary objections.	0.20	850.00	\$170.00
06/28/2018	WNL	CO	Review and analyze issues and arguments re: Opposition to Motion to Strike Claims.	0.80	850.00	\$680.00

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06/29/2018	WNL	CO	Review comments to Supplement to opposition to Motion to Strike.	0.20	850.00	\$170.00
06/29/2018	WNL	CO	Review additional correspondence re: comments on Supplemental Opposition to Motion to Strike Claims.	0.10	850.00	\$85.00
06/29/2018	WNL	CO	Review correspondence and analyze issues re: arguments raised by Beitler in pleadings involving Motion to Strike claims.	0.20	850.00	\$170.00
06/29/2018	WNL	CO	Review correspondence and comments re: declarations filed by the Beitler parties.	0.20	850.00	\$170.00
06/29/2018	WNL	CO	Review and analyze additional correspondence re: facts alleged in Beitler pleadings.	0.20	850.00	\$170.00
06/29/2018	WNL	CO	Review correspondence re: Reply concerning Motion to Strike Claims.	0.10	850.00	\$85.00
06/29/2018	WNL	CO	Review correspondence re: evidentiary issues.	0.10	850.00	\$85.00
06/29/2018	WNL	CO	Review and analyze correspondence re: inconsistencies in testimony by B. Beitler.	0.40	850.00	\$340.00
06/29/2018	WNL	CO	Review comments to evidence proposed by Beitler parties.	0.10	850.00	\$85.00
06/29/2018	WNL	CO	Review and analyze Supplemental Opposition to Motion to Strike Claims.	1.80	850.00	\$1,530.00
				42.10		\$31,857.50

Fee/Employment Application

06/05/2018	WNL	FE	Review correspondence re: employment of Force 10.	0.10	850.00	\$85.00
				0.10		\$85.00

Fees of Professionals

06/04/2018	NPL	FP	Review and analysis of professional fees incurred by Pachulski Stang Ziehl & Jones.	0.40	250.00	\$100.00
				0.40		\$100.00

Litigation (Non-Bankruptcy)

06/01/2018	WNL	LN	Review Order allowing withdrawal of Bobby Samini as counsel.	0.10	850.00	\$85.00
06/01/2018	WNL	LN	Formulate strategy re: arbitrations and timing issues.	0.60	850.00	\$510.00
06/04/2018	WNL	LN	Review correspondence re: pending arbitrations.	0.10	850.00	\$85.00
06/04/2018	NPL	LN	Review notice of ruling regarding Samini motion to withdraw as counsel regarding Beitler v. Bral state litigation case number, BC532523.	0.10	250.00	\$25.00

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06/05/2018	NPL	LN	Review correspondence from AAA regarding status of Bral v. Gross, et al.	0.10	250.00	\$25.00
06/05/2018	NPL	LN	Review correspondence from T. Lallas to AAA regarding status of Bral v. Beitler.	0.10	250.00	\$25.00
06/05/2018	NPL	LN	Review JAMS invoice regarding Bral v. Westcliff; draft email to A. Friedman regarding same.	0.30	250.00	\$75.00
06/05/2018	WNL	LN	Review Tom Lallas' response re: Stay of arbitration	0.10	850.00	\$85.00
06/05/2018	WNL	LN	Review Report Re: Status of Bankruptcy Stay.	0.10	850.00	\$85.00
06/05/2018	WNL	LN	Review correspondence re: status report in pending arbitration.	0.10	850.00	\$85.00
06/07/2018	NPL	LN	Review notice of case management conference regarding Bral v. Westcliff; attention to dates and deadlines regarding same.	0.10	250.00	\$25.00
06/07/2018	WNL	LN	Review correspondence re: re: Westcliff arbitration.	0.10	850.00	\$85.00
06/08/2018	NPL	LN	Review and reply to email from L. Gauthier regarding status report for Bral v. Westcliff; finalize same.	0.20	250.00	\$50.00
06/08/2018	WNL	LN	Review draft scheduling order re: Westcliff arbitration.	0.10	850.00	\$85.00
06/08/2018	WNL	LN	Review and execute Status Report in Westcliff arbitration; confer with N. Lockwood re: same.	0.10	850.00	\$85.00
06/11/2018	NPL	LN	Review and reply to email from L. Gauthier regarding Bral v. Westcliff status report.	0.10	250.00	\$25.00
06/11/2018	NPL	LN	Confer with W. Lobel regarding Bral v. Westcliff status report.	0.10	250.00	\$25.00
06/11/2018	NPL	LN	Draft email to L. Gauthier regarding service list for Bral v. Westcliff status report.	0.10	250.00	\$25.00
06/11/2018	NPL	LN	Prepare service list regarding Bral v. Westcliff status report.	0.20	250.00	\$50.00
06/11/2018	NPL	LN	Finalize Bral v. Westcliff status report.	0.30	250.00	\$75.00
06/12/2018	NPL	LN	Review and reply to email from L. Gauthier regarding Bral v. Westcliff status conference.	0.20	250.00	\$50.00
06/15/2018	WNL	LN	Review demand for withdrawal of cross complaint.	0.10	850.00	\$85.00
06/15/2018	WNL	LN	Review correspondence re: pending hearing on Motion to Compel Responses to discovery.	0.10	850.00	\$85.00
06/15/2018	WNL	LN	Review Court's tentative ruling on Motion to Compel Supplemental Responses to Discovery.	0.10	850.00	\$85.00
06/15/2018	WNL	LN	Review Notice of Withdrawal of Certain Portions of Reply Brief .	0.10	850.00	\$85.00
06/15/2018	WNL	LN	Review comments to draft Notice of Withdrawal of Portions of Reply Brief.	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/15/2018	WNL	LN	Review and comment on draft Notice of Withdrawal of Reply.	0.40	850.00	\$340.00
06/15/2018	WNL	LN	Review correspondence re: timing of filing withdrawal of portions of Reply.and related issues.	0.20	850.00	\$170.00
06/15/2018	WNL	LN	Review correspondence re: reaction to Court's tentative ruling on discovery motion.	0.10	850.00	\$85.00
06/15/2018	WNL	LN	Review correspondence re: timing and related issues concerning response to Court's tentative ruling.	0.20	850.00	\$170.00
06/15/2018	WNL	LN	Review and analyze Motion to Strike Declaration of Alan Friedman and evidentiary objections.	0.20	850.00	\$170.00
06/15/2018	WNL	LN	Review correspondence re: Motion to Strike Declaration of Alan Friedman.	0.30	850.00	\$255.00
06/18/2018	WNL	LN	Review draft responses to form interrogatories in Mission litigation.	0.20	850.00	\$170.00
06/18/2018	WNL	LN	Review correspondence re: Motion to Compel Discovery.	0.10	850.00	\$85.00
06/18/2018	WNL	LN	Review Order relieving Bobby Samini as counsel in the Steward Financial litigation and related correspondence.	0.10	850.00	\$85.00
06/20/2018	WNL	LN	Review and respond to correspondence re:Joint Stipulation re: Remaining Discovery issues.	0.10	850.00	\$85.00
06/20/2018	WNL	LN	Analyze appellate and timing issues.	0.50	850.00	\$425.00
06/21/2018	WNL	LN	Review Stipulation Resolving Discovery Disputes.	0.10	850.00	\$85.00
06/22/2018	WNL	LN	Review correspondence re: applicability of FRBP 7068.	0.10	850.00	\$85.00
06/27/2018	WNL	LN	Review correspondence re: pending state court litigation.	0.20	850.00	\$170.00
06/27/2018	WNL	LN	Review correspondence and consider timing issues re: pending arbitrations.	0.20	850.00	\$170.00
				<u>6.90</u>		<u>\$4,725.00</u>

Plan & Disclosure Stmt. [B320]

06/01/2018	WNL	PD	Review and comment on revised Disclosure Statement.	1.80	850.00	\$1,530.00
06/01/2018	WNL	PD	Review correspondence re: action to be taken.	0.10	850.00	\$85.00
06/01/2018	WNL	PD	Review and analyze disclosure statement and plan confirmation issues.	0.90	850.00	\$765.00
06/01/2018	WNL	PD	Address timing and exclusivity issues.	0.30	850.00	\$255.00
06/01/2018	TCF	PD	Review and revise second amended disclosure statement.	2.80	650.00	\$1,820.00
06/01/2018	TCF	PD	Research and analysis regarding plan and	2.20	650.00	\$1,430.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			confirmation issues.			
06/01/2018	TCF	PD	Correspond with W. Lobel regarding plan and confirmation issues.	0.10	650.00	\$65.00
06/01/2018	TCF	PD	Correspondence with team regarding amendments to disclosure statement.	0.10	650.00	\$65.00
06/04/2018	WNL	PD	Review and analyze correspondence re: disallowance of claims and right to vote.	0.10	850.00	\$85.00
06/04/2018	WNL	PD	Analyze potential objections to confirmation.	0.50	850.00	\$425.00
06/04/2018	WNL	PD	Analyze and formulate responses to potential objections to confirmation.	0.40	850.00	\$340.00
06/04/2018	NPL	PD	Confer with W. Lobel regarding status of hearing on approval of amended disclosure statement.	0.10	250.00	\$25.00
06/05/2018	WNL	PD	Review latest revised disclosure statement.	1.40	850.00	\$1,190.00
06/05/2018	WNL	PD	Review and respond to correspondence re: latest version of Disclosure Statement.	0.80	850.00	\$680.00
06/05/2018	WNL	PD	Telephone cal with A. Friedman re: changes to Disclosure Statement and remainung issues.	0.30	850.00	\$255.00
06/05/2018	WNL	PD	Review Scheduling Order re: Plan and Disclosure Statement.	0.10	850.00	\$85.00
06/05/2018	WNL	PD	Review and analyze A. Friedman's changes to draft Disclosure Statement.	0.50	850.00	\$425.00
06/05/2018	WNL	PD	Review and analyze revised Disclosure Statement.	0.80	850.00	\$680.00
06/05/2018	TCF	PD	Review and revise second amended disclosure statement.	1.40	650.00	\$910.00
06/05/2018	TCF	PD	Research regarding plan issues.	0.80	650.00	\$520.00
06/05/2018	NPL	PD	Review scheduling order regarding first amended disclosure statement and plan; attention to dates and deadlines regarding same.	0.40	250.00	\$100.00
06/06/2018	WNL	PD	Review further revision of Disclosure Statement.	0.60	850.00	\$510.00
06/06/2018	WNL	PD	Review correspondence re: additional change to Disclosure Statement.	0.10	850.00	\$85.00
06/06/2018	WNL	PD	Review and analyze additional comments to Disclosure Statement.	0.40	850.00	\$340.00
06/06/2018	WNL	PD	Review and analyze pending plan and confirmation issues.	0.70	850.00	\$595.00
06/06/2018	TCF	PD	Research regarding confirmation issues.	1.60	650.00	\$1,040.00
06/06/2018	TCF	PD	Address plan and disclosure statement amendments and issues.	1.30	650.00	\$845.00
06/07/2018	WNL	PD	Review additional comments on Disclosure Statement.	0.10	850.00	\$85.00
06/07/2018	WNL	PD	Review and analyze latest iteration of Disclosure	0.70	850.00	\$595.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Statement.			
06/07/2018	WNL	PD	Review and analyze comments to revised Disclosure Statement.	0.20	850.00	\$170.00
06/07/2018	WNL	PD	Review correspondence re: comments on Amended Plan and Disclosure Statement.	0.20	850.00	\$170.00
06/07/2018	WNL	PD	Review correspondence re: revision of numbers in Disclosure Statement.	0.30	850.00	\$255.00
06/07/2018	WNL	PD	Review changes to Disclosure Statement.	0.70	850.00	\$595.00
06/07/2018	WNL	PD	Review additional correspondence re: changes to Disclosure Statement.	0.10	850.00	\$85.00
06/07/2018	WNL	PD	Analyze creditor classification and treatment alternatives under plan.	0.60	850.00	\$510.00
06/07/2018	TCF	PD	Review and revise second amended disclosure statement.	1.20	650.00	\$780.00
06/07/2018	TCF	PD	Review and revise second amended plan.	1.00	650.00	\$650.00
06/07/2018	TCF	PD	Research regarding plan matters; revisions to plan and disclosure statement.	2.80	650.00	\$1,820.00
06/07/2018	NPL	PD	Assist J. O'Keefe with revisions to 2nd amended disclosure statement and plan.	1.10	250.00	\$275.00
06/08/2018	WNL	PD	Review and analyze final version of Disclosure Statement, including the latest sets of revisions.	1.40	850.00	\$1,190.00
06/08/2018	WNL	PD	Review correspondence re: pleadings to be filed today.	0.30	850.00	\$255.00
06/08/2018	WNL	PD	Review and analyze final version of Second Amended Plan.	0.70	850.00	\$595.00
06/08/2018	WNL	PD	Review correspondence re: documents being filed.	0.10	850.00	\$85.00
06/08/2018	WNL	PD	Review and analyze latest versions of financial projections to be attached to Disclosure Statement.	0.20	850.00	\$170.00
06/08/2018	WNL	PD	Review correspondence and pleadings being filed in connection with the Plan and Disclosure Statement.	0.20	850.00	\$170.00
06/08/2018	NPL	PD	Telephone call with L. Gauthier regarding second amended disclosure statement and second amended plan of reorganization.	0.10	250.00	\$25.00
06/08/2018	NPL	PD	Review and reply to email from L. Gauthier regarding second amended disclosure statement and second amended plan of reorganization.	0.10	250.00	\$25.00
06/08/2018	NPL	PD	Revise and finalize second amended plan of reorganization.	1.40	250.00	\$350.00
06/08/2018	NPL	PD	Revise and finalize second amended disclosure statement.	1.80	250.00	\$450.00
06/08/2018	NPL	PD	Finalize notice of redline regarding second amended plan.	0.30	250.00	\$75.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/08/2018	NPL	PD	Finalize notice of redline regarding second amended disclosure statement.	0.40	250.00	\$100.00
06/08/2018	NPL	PD	Draft email to T. Lallas regarding second amended disclosure statement and second amended plan of reorganization.	0.10	250.00	\$25.00
06/08/2018	NPL	PD	Draft email to L. Gauthier regarding service list for second amended disclosure statement and second amended plan of reorganization.	0.10	250.00	\$25.00
06/08/2018	NPL	PD	Prepare service list for second amended disclosure statement and second amended plan of reorganization.	0.30	250.00	\$75.00
06/08/2018	NPL	PD	Review and reply to email from L. Gauthier regarding service list for second amended disclosure statement and second amended plan of reorganization.	0.10	250.00	\$25.00
06/11/2018	WNL	PD	Review redlined Plan and Disclosure Statement.	1.60	850.00	\$1,360.00
06/11/2018	WNL	PD	Analyze objections to Disclosure Statement and confirmation issues.	0.80	850.00	\$680.00
06/12/2018	WNL	PD	Analyze and consider issues and alternatives re: plan structure.	1.40	850.00	\$1,190.00
06/12/2018	WNL	PD	Analyze objections to Disclosure Statement and responses thereto.	0.80	850.00	\$680.00
06/13/2018	WNL	PD	Formulate responses to potential objections to Plan confirmation.	0.70	850.00	\$595.00
06/14/2018	WNL	PD	Review confirmation requirements and issues raised thereby.	0.90	850.00	\$765.00
06/18/2018	WNL	PD	Analyze issues concerning potential objections to plan confirmation.	0.70	850.00	\$595.00
06/20/2018	WNL	PD	Review draft pleadings re: Objections to Disclosure Statement.	0.80	850.00	\$680.00
06/20/2018	WNL	PD	Review correspondence and analyze issues re: plan structure and objections.	0.40	850.00	\$340.00
06/22/2018	WNL	PD	Review and analyze pleadings and arguments.	1.80	850.00	\$1,530.00
06/22/2018	TCF	PD	Telephone conference with A. Friedman regarding disclosure statement and plan issues.	0.20	650.00	\$130.00
06/26/2018	WNL	PD	Review and analyze comments to draft Plan Support Agreement.	0.30	850.00	\$255.00
06/27/2018	WNL	PD	Analyze arguments in opposition to confirmation of Plan.	0.60	850.00	\$510.00
06/28/2018	WNL	PD	Review and analyze issues concerning confirmation of Plan.	0.60	850.00	\$510.00
06/29/2018	WNL	PD	Confer with A. Friedman re: latest pleadings by B. Beitler.	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/29/2018	TCF	PD	Review and analysis of disclosure statement issues and objection.	0.60	650.00	\$390.00
06/29/2018	TCF	PD	Review and analysis of disclosure statement objection and issues; correspondence with respect thereto.	0.30	650.00	\$195.00
06/30/2018	TCF	PD	Telephone conference with A. Friedman regarding reply to disclosure statement objection.	0.30	650.00	\$195.00
					<hr/> 50.20	<hr/> \$35,550.00
TOTAL SERVICES FOR THIS MATTER:					\$127,527.50	

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Expenses

05/31/2018	AT	Auto Travel Expense [E109] Count Of Orange Parking, WNL	14.00
05/31/2018	CC	Conference Call [E105] AT&T Conference Call, WBL	5.24
06/03/2018	LN	10601.00001 Lexis Charges for 06-03-18	12.12
06/04/2018	LN	10601.00001 Lexis Charges for 06-04-18	116.54
06/07/2018	FF	Filing Fee [E112] Los Angeles Superior Court, WNL	8.25
06/08/2018	OS	Case Anywhere, Inv. 132903, WNL	120.00
06/08/2018	OS	GSO, Inv. 3662006, WNL	25.04
06/10/2018	LN	10601.00001 Lexis Charges for 06-10-18	10.60
06/12/2018	LN	10601.00001 Lexis Charges for 06-12-18	0.77
06/17/2018	LN	10601.00001 Lexis Charges for 06-17-18	34.86
06/20/2018	LN	10601.00001 Lexis Charges for 06-20-18	21.95
06/21/2018	LN	10601.00001 Lexis Charges for 06-21-18	81.69
06/30/2018	PAC	Pacer - Court Research	25.60
Total Expenses for this Matter			\$476.66

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REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For current services rendered through 06/30/2018

Total Fees	\$127,527.50
Chargeable costs and disbursements	\$476.66
Total Due on Current Invoice.....	\$128,004.16

Outstanding Balance from prior Invoices as of 06/30/2018 **(May not reflect recent payments)**

Invoice Number	Invoice Date	Fees Billed	Expenses Billed	Balance Due
118521	01/31/2018	\$64,977.50	\$1.40	\$64,978.90
118768	02/28/2018	\$89,105.00	\$6,717.72	\$95,822.72
119267	03/31/2018	\$170,795.00	\$818.42	\$171,613.42
119338	04/30/2018	\$241,285.00	\$12,901.06	\$254,186.06
119732	06/13/2018	\$165,330.00	\$2,241.54	\$167,571.54
Total Amount Due on Current and Prior Invoices				\$882,176.80

Pachulski Stang Ziehl & Jones LLP

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

July 31, 2018
Invoice 120454
Client 10601
Matter 00001
WNL

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 07/31/2018

FEES	\$120,280.00
EXPENSES	\$2,092.83
TOTAL CURRENT CHARGES	\$122,372.83
BALANCE FORWARD	\$882,176.80
TOTAL BALANCE DUE	\$1,004,549.63

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	0.50	\$425.00
BL	Bankruptcy Litigation [L430]	11.90	\$7,065.00
BO	Business Operations	1.00	\$850.00
CA	Case Administration [B110]	28.50	\$17,265.00
CO	Claims Admin/Objections[B310]	79.30	\$49,595.00
F	Fees of Professionals	1.40	\$350.00
FE	Fee/Employment Application	0.60	\$510.00
L	Litigation	0.20	\$50.00
LN	Litigation (Non-Bankruptcy)	0.40	\$340.00
PD	Plan & Disclosure Stmt. [B320]	61.40	\$43,830.00
		185.20	\$120,280.00

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	48.80	\$12,200.00
SAOS	O'Keefe, Sean A	Counsel	750.00	29.40	\$22,050.00
TCF	Flanagan, Tavi C.	Counsel	650.00	24.60	\$15,990.00
WNL	Lobel, William N.	Partner	850.00	82.40	\$70,040.00
				185.20	\$120,280.00

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Working Meals [E111]	\$209.57
Outside Services	\$1,251.95
Pacer - Court Research	\$120.80

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Postage [E108]	\$122.84
Reproduction/ Scan Copy	\$49.80
Overtime	\$247.37
Transcript [E116]	\$90.50
	<hr/> <hr/> \$2,092.83

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
07/05/2018	WNL	AA	Review proposed status report for Bral v. Beitler adversary.	0.20	850.00	\$170.00
07/17/2018	WNL	AA	Review correspondence re: payment of appraisal fee for Sandpiper appraisal.	0.10	850.00	\$85.00
07/17/2018	WNL	AA	Review and respond to additional correspondence re: payment for appraisal of Sandpiper property.	0.10	850.00	\$85.00
07/23/2018	WNL	AA	Review correspondence re: section 544 actions and action needed.	0.10	850.00	\$85.00
				0.50		\$425.00

Bankruptcy Litigation [L430]

07/03/2018	WNL	BL	Review draft status reports and related correspondence.	0.20	850.00	\$170.00
07/03/2018	WNL	BL	Review draft status reports in non-dischargeability litigation.	0.20	850.00	\$170.00
07/05/2018	WNL	BL	Review and execute status reports in non-dischargeability actions.	0.20	850.00	\$170.00
07/05/2018	WNL	BL	Review and respond to correspondence re" status reports on non-dischargeability litigation.	0.10	850.00	\$85.00
07/05/2018	WNL	BL	Review status reports on pending cases in bankruptcy court.	0.10	850.00	\$85.00
07/05/2018	NPL	BL	Review and reply to email from A. Friedman regarding status reports for adversary cases.	0.10	250.00	\$25.00
07/05/2018	NPL	BL	Review and reply to email from L. Gauthier regarding status reports for adversary cases.	0.10	250.00	\$25.00
07/05/2018	NPL	BL	Office conference with W. Lobel regarding status reports for adversary cases.	0.10	250.00	\$25.00
07/05/2018	NPL	BL	Telephone call with L. Gauthier regarding status reports for adversary cases.	0.10	250.00	\$25.00
07/05/2018	NPL	BL	Revise and finalize joint status report for adversary case Beitler & Associates v. Bral.	0.20	250.00	\$50.00
07/05/2018	NPL	BL	Revise and finalize joint status report for adversary case Beitler v. Bral.	0.20	250.00	\$50.00
07/05/2018	NPL	BL	Revise and finalize joint status report for adversary case Steward Financial v. Bral.	0.20	250.00	\$50.00
07/05/2018	NPL	BL	Draft email to K. Meshefesian regarding joint status reports for adversary cases.	0.10	250.00	\$25.00
07/13/2018	NPL	BL	Prepare counsel for hearing on motion for summary judgment regarding Bral v. Beitler.	0.60	250.00	\$150.00
07/13/2018	NPL	BL	Prepare counsel for status conference regarding	0.20	250.00	\$50.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Beitler v. Bral.			
07/13/2018	NPL	BL	Prepare counsel for status conference regarding Beitler & Co. v. Bral.	0.20	250.00	\$50.00
07/13/2018	NPL	BL	Prepare counsel for status conference regarding Steward Financial v. Bral.	0.20	250.00	\$50.00
07/20/2018	NPL	BL	Review electronic notice regarding motion striking claims in adversary matters.	0.10	250.00	\$25.00
07/20/2018	NPL	BL	Review electronic notice continuing hearing on motion for summary judgment and claim avoidance regarding Bral v. Beitler; attention to dates and deadlines regarding same.	0.10	250.00	\$25.00
07/20/2018	NPL	BL	Review electronic notices regarding Beitler Creditors' adversary matters continuing status conference; attention to dates and deadlines regarding same.	0.20	250.00	\$50.00
07/22/2018	SAO	BL	Review and revise motion to dismiss dischargeability complaint filed by Steward Financial.	2.30	750.00	\$1,725.00
07/23/2018	WNL	BL	Review and respond to correspondence re: pending adversaries and confer wit N' Lockwood re: same.	0.10	850.00	\$85.00
07/23/2018	WNL	BL	Review and analyze first amended complaint in Steward Financial non-dischargeability complaint.	0.40	850.00	\$340.00
07/23/2018	WNL	BL	Review comments to response to Steward First Amended Complaint.	0.20	850.00	\$170.00
07/23/2018	WNL	BL	Review correspondence re: 523 actions.	0.10	850.00	\$85.00
07/23/2018	WNL	BL	Review comments to Steward non-dischargeability.	0.20	850.00	\$170.00
07/23/2018	WNL	BL	Review and analyze comments to Motion To Dismiss Amended Complaint for Non-Dischargeability.	0.90	850.00	\$765.00
07/23/2018	WNL	BL	Review additional correspondence re: Motion To Dismiss.	0.20	850.00	\$170.00
07/23/2018	WNL	BL	Review and analyze additional comments to Motion To Dismiss Steward Complaint.	0.60	850.00	\$510.00
07/23/2018	NPL	BL	Review email from S. O'Keefe regarding motion to dismiss Steward v. Bral complaint.	0.10	250.00	\$25.00
07/23/2018	NPL	BL	Review and reply to email from A. Friedman regarding orders relieving the stay for adversary matters.	0.10	250.00	\$25.00
07/23/2018	NPL	BL	Review and reply to email from L. Gauthier regarding motion to dismiss Steward v. Bral complaint.	0.10	250.00	\$25.00
07/23/2018	NPL	BL	Revise motion to dismiss Steward v. Bral complaint; forward same to T. Flanagan for review.	0.30	250.00	\$75.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/23/2018	NPL	BL	Draft email to A. Friedman regarding motion to dismiss Steward v. Bral complaint; review and reply to email from A. Friedman regarding same.	0.10	250.00	\$25.00
07/24/2018	WNL	BL	Analyze issues and applicable law re: Steward non-dischargeability claim.	0.70	850.00	\$595.00
07/24/2018	WNL	BL	Review correspondence re: Steward non-dischargeability claim.	0.20	850.00	\$170.00
07/31/2018	WNL	BL	Review correspondence and transcript of October 19, 2017 hearing on stays and related issues.	0.50	850.00	\$425.00
07/31/2018	NPL	BL	Prepare order lifting stay regarding Beitler parties adversary matters; forward same to A. Friedman for review.	0.40	250.00	\$100.00
07/31/2018	NPL	BL	Draft email to A. Friedman regarding order lifting stay of adversary matters.	0.20	250.00	\$50.00
07/31/2018	NPL	BL	Review relevant transcripts and pleadings applicable to the preparation of the order lifting stay of the adversary matters.	0.70	250.00	\$175.00
				11.90	\$7,065.00	

Business Operations

07/12/2018	WNL	BO	Review correspondence re: payment of distribution from Westcliff to Cannae.	0.10	850.00	\$85.00
07/12/2018	WNL	BO	Review correspondence re: payment of J. Bral's expenses by Bral Realty.	0.10	850.00	\$85.00
07/12/2018	WNL	BO	Review correspondence re: distributions from LLC's.	0.10	850.00	\$85.00
07/12/2018	WNL	BO	Review correspondence re: logistics of making distributions from Westcliff.	0.10	850.00	\$85.00
07/12/2018	WNL	BO	Review additional correspondence re: distributions from Westcliff.	0.10	850.00	\$85.00
07/12/2018	WNL	BO	Review correspondence re: distribution from Westcliff.	0.10	850.00	\$85.00
07/13/2018	WNL	BO	Review correspondence re: distributions from Bral Realty.	0.10	850.00	\$85.00
07/13/2018	WNL	BO	Review suggested additional language for status report re distribution to Cannae.	0.10	850.00	\$85.00
07/13/2018	WNL	BO	Review correspondence re: reimbursement of expenses by Bral Realty.	0.10	850.00	\$85.00
07/13/2018	WNL	BO	Confer with A. Friedman re: payment of expenses by Bral Realty..	0.10	850.00	\$85.00
				1.00	\$850.00	

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Case Administration [B110]						
07/02/2018	NPL	CA	Review and reply to email from L. Gauthier regarding opposition to motion to convert.	0.10	250.00	\$25.00
07/02/2018	NPL	CA	Prepare service lists for opposition to motion to convert case, declarations and request for judicial notice regarding same.	0.30	250.00	\$75.00
07/03/2018	NPL	CA	Review, compile and organize exhibits to request for judicial notice in support of opposition to motion to convert case.	1.60	250.00	\$400.00
07/03/2018	NPL	CA	Review and reply to email from L. Gauthier regarding opposition to motion to convert case.	0.10	250.00	\$25.00
07/03/2018	NPL	CA	Telephone call with L. Gauthier regarding opposition to motion to convert case.	0.10	250.00	\$25.00
07/03/2018	NPL	CA	Review and reply to email from L. Gauthier regarding declaration of A. Meislik in support of opposition to motion to convert case.	0.10	250.00	\$25.00
07/03/2018	NPL	CA	Revise declaration of A. Meislik in support of opposition to motion to convert case.	0.80	250.00	\$200.00
07/05/2018	WNL	CA	Review final version of Debtor's opposition To Beitler Creditors' Motion To Convert Case.	0.40	850.00	\$340.00
07/05/2018	WNL	CA	=Review Declarations to be filed in support of Debtor's Oppositoion the Motion To Convert Case.	0.30	850.00	\$255.00
07/05/2018	WNL	CA	Review final draft of Evidentiary Objections to Declaration of Gary Klausner in Support of Motion to Convert Case.	0.10	850.00	\$85.00
07/05/2018	WNL	CA	Review correspondence re: Opposition to Motion to Convert.	0.10	850.00	\$85.00
07/05/2018	WNL	CA	Review additional correspondence re: finalization of Opposition to Motion to Convert.	0.20	850.00	\$170.00
07/05/2018	WNL	CA	Analyze issues and arguments re: Beitler attempt to convert case to chapter 7.	1.60	850.00	\$1,360.00
07/05/2018	WNL	CA	Review final form of Debtor's Opposittion to Motion to Convert Case to Chapter 7 and supporting declarations.	0.60	850.00	\$510.00
07/05/2018	WNL	CA	Review correspondence and comments re: Motion to Convert Case.	0.20	850.00	\$170.00
07/05/2018	NPL	CA	Review and reply to email from L Gauthier regarding opposition to motion to convert case.	0.10	250.00	\$25.00
07/05/2018	NPL	CA	Telephone call with L. Gauthier regarding opposition to motion to convert case.	0.10	250.00	\$25.00
07/05/2018	NPL	CA	Review and reply to email from L. Gauthier regarding declaration of J. Bral in support of opposition to motion to convert case.	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/05/2018	NPL	CA	Draft email to A. Friedman regarding appendix of unpublished cases regarding opposition to motion to convert case.	0.10	250.00	\$25.00
07/05/2018	NPL	CA	Review and reply to email from A. Friedman regarding appendix of unpublished cases regarding opposition to motion to convert case	0.10	250.00	\$25.00
07/05/2018	NPL	CA	Research and review LEXIS unpublished cases regarding opposition to motion to convert case.	0.80	250.00	\$200.00
07/05/2018	NPL	CA	Prepare appendix of unpublished cases regarding opposition to motion to convert case; forward same to A. Friedman for review.	0.60	250.00	\$150.00
07/05/2018	NPL	CA	Revise and finalize opposition to motion to convert case.	1.20	250.00	\$300.00
07/05/2018	NPL	CA	Revise and finalize request for judicial notice regarding opposition to motion to convert case.	1.60	250.00	\$400.00
07/05/2018	NPL	CA	Finalize declaration of A. Meislik in support of opposition to motion to convert case.	0.30	250.00	\$75.00
07/05/2018	NPL	CA	Finalize declaration of J. Bral in support of opposition to motion to convert case.	0.40	250.00	\$100.00
07/05/2018	NPL	CA	Finalize evidentiary objections to declaration of G. Klausner in support of motion to convert case.	0.30	250.00	\$75.00
07/05/2018	NPL	CA	Revise and finalize appendix of unpublished cases in support of opposition to motion to convert case.	0.50	250.00	\$125.00
07/10/2018	WNL	CA	Analyze relevant cases and arguments re ppotential conversion of case to chapter 7.	1.90	850.00	\$1,615.00
07/11/2018	WNL	CA	Analyze arguments re: rehabilitation versus reorganization.	0.70	850.00	\$595.00
07/12/2018	NPL	CA	Review email from A. Friedman regarding revisions to June operating report.	0.10	250.00	\$25.00
07/13/2018	WNL	CA	Review and analyze arguments and controlling law re: Motion to Convert Chapter 11.	1.80	850.00	\$1,530.00
07/13/2018	NPL	CA	Prepare counsel for chapter 11 status conference.	0.20	250.00	\$50.00
07/13/2018	NPL	CA	Prepare counsel for hearing on motion to convert case to chapter 7.	0.60	250.00	\$150.00
07/15/2018	WNL	CA	Review and analyze pleadings and cases and prepare arguments re: Motion to Convert chapter 11.	3.90	850.00	\$3,315.00
07/16/2018	WNL	CA	Review Monthly Operating Report for June, 2018.	0.10	850.00	\$85.00
07/16/2018	WNL	CA	Analyze cases relavant to Motion to Convert.	1.90	850.00	\$1,615.00
07/17/2018	WNL	CA	Review pleadings and modify arguments in opposition to Motion to Convert chapter 11.	1.30	850.00	\$1,105.00
07/17/2018	WNL	CA	Analyze issues and arguments relevant to Motion to Convert.	1.60	850.00	\$1,360.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/18/2018	WNL	CA	Review and analyze Court's Order Denying Without Prejudice Motion to Convert Chapter 11.	0.20	850.00	\$170.00
07/18/2018	NPL	CA	Review entered order denying motion to convert case.	0.10	250.00	\$25.00
07/18/2018	NPL	CA	Prepare W. Lobe for hearing on motion to convert.	1.10	250.00	\$275.00
07/20/2018	NPL	CA	Review and reply to email from L. Gauthier regarding hearing transcript; attention to same.	0.20	250.00	\$50.00
				28.50		\$17,265.00

Claims Admin/Objections[B310]

07/04/2018	SAO	CO	Review declarations filed by Beitler Parties in support of supplemental brief in opposition to motion to strike claims.	1.10	750.00	\$825.00
07/05/2018	WNL	CO	Analyze issues and evidentiary issues concerning objections to claims.	1.60	850.00	\$1,360.00
07/05/2018	SAO	CO	Begin preparation of response to Beitler's last supplemental brief re motion to strike.	1.50	750.00	\$1,125.00
07/06/2018	SAO	CO	Continue preparation of reply to Beitler Parties final brief.	1.90	750.00	\$1,425.00
07/07/2018	SAO	CO	Continue drafting final brief in support of motion to strike Beitler Parties claims and in response to Beitler Parties final opposition brief.	5.90	750.00	\$4,425.00
07/08/2018	SAO	CO	Continue preparing final brief in support of motion to strike and in opposition to final brief filed by Beitler Parties.	3.90	750.00	\$2,925.00
07/09/2018	WNL	CO	Review and comment on draft of final brief and proposed statement of undisputed facts.	1.60	850.00	\$1,360.00
07/09/2018	WNL	CO	Review and comment on draft Reply to Beitler's Supplemental Brief.	0.70	850.00	\$595.00
07/09/2018	WNL	CO	Analyze pending issues and responses re: claims objections.	0.70	850.00	\$595.00
07/10/2018	WNL	CO	Analyze issues re: Motion to Strike Claims and related issues and effect on plan and confirmation.	1.80	850.00	\$1,530.00
07/11/2018	NPL	CO	Review and reply to email from L. Gauthier regarding motion to strike declarations of Lallas and Hurwitz.	0.10	250.00	\$25.00
07/11/2018	NPL	CO	Draft email to L. Gauthier regarding appendix of unpublished cases regarding motion to strike declarations of Lallas and Hurwitz.	0.10	250.00	\$25.00
07/11/2018	NPL	CO	Research and review unpublished cases regarding motion to strike declarations of Lallas and Hurwitz.	0.40	250.00	\$100.00
07/11/2018	NPL	CO	Prepare appendix of unpublished cases in regarding motion to strike declarations of Lallas and Hurwitz.	0.60	250.00	\$150.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/11/2018	NPL	CO	Review and reply to email from J. O'Keefe regarding motion to strike declarations of Lallas and Hurwitz.	0.10	250.00	\$25.00
07/11/2018	NPL	CO	Review and reply to email from L. Gauthier regarding status of pleadings regarding motion to strike declarations of Lallas and Hurwitz, etc.	0.10	250.00	\$25.00
07/11/2018	NPL	CO	Draft email to J. O'Keefe regarding motion to strike declarations of Lallas and Hurwitz and supplemental reply to objection to motion to strike	0.10	250.00	\$25.00
07/11/2018	NPL	CO	Revise request for judicial notice in support of motion to strike declarations.	0.30	250.00	\$75.00
07/11/2018	NPL	CO	Revise evidentiary objection to declaration of T. Lallas regarding motion to strike.	0.20	250.00	\$50.00
07/11/2018	NPL	CO	Revise evidentiary objections to Hamilton declaration regarding motion to strike.	0.30	250.00	\$75.00
07/11/2018	NPL	CO	Revise declaration of A. Friedman in support of order shortening time regarding motion to strike.	0.20	250.00	\$50.00
07/11/2018	NPL	CO	Revise application for an order shortening time regarding motion to strike.	0.20	250.00	\$50.00
07/11/2018	NPL	CO	Draft email to L. Gauthier regarding status of pleadings; review and reply to email from L. Gauthier regarding same.	0.20	250.00	\$50.00
07/11/2018	NPL	CO	Review pleadings in support of motion to strike and supplemental reply to motion to strike.	0.30	250.00	\$75.00
07/12/2018	WNL	CO	Review final version of Supplemental Brief in Support of Motion to Strike Claims.	0.90	850.00	\$765.00
07/12/2018	WNL	CO	Review correspondence and Declaration of A. Friedman re: Motion to Strike Declarations.	0.10	850.00	\$85.00
07/12/2018	WNL	CO	Review additional pleadings re: Motion to Strike Declarations.	0.20	850.00	\$170.00
07/12/2018	WNL	CO	Review and analyze Proposed Findings of Fact and Conclusions of Law re: Motion to Strike Claims.	1.40	850.00	\$1,190.00
07/12/2018	WNL	CO	Review Evidentiary Objections to Declarations of T. Hamilton and T. Lallas.	0.20	850.00	\$170.00
07/12/2018	WNL	CO	Review additional correspondence re: late submitted Declarations.	0.20	850.00	\$170.00
07/12/2018	WNL	CO	Review Reply to Objections to Declaration of Gary Klausner.	0.20	850.00	\$170.00
07/12/2018	WNL	CO	Review final version of Reply Brief re: Motion to Strike Claims.	0.90	850.00	\$765.00
07/12/2018	WNL	CO	Review revised Motion to Strike declarations.	0.20	850.00	\$170.00
07/12/2018	NPL	CO	Review and reply to email from A. Friedman regarding motion to strike declarations.	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/12/2018	NPL	CO	Review email from G. Pemberton regarding revised supplemental brief in support of motion to strike declarations and request for judicial regarding same.	0.10	250.00	\$25.00
07/12/2018	NPL	CO	Telephone call with L. Gauthier regarding reply to motion to strike declarations and supplemental brief in support of motion seeking disallowance of Beitler parties claims.	0.20	250.00	\$50.00
07/12/2018	NPL	CO	Telephone call with L. Gauthier regarding findings of facts and conclusion of law in support of supplemental brief in support of motion seeking disallowance of Beitler parties claims.	0.10	250.00	\$25.00
07/12/2018	NPL	CO	Revise and finalize supplemental brief in support of motion seeking disallowance of Beitler parties claims.	1.10	250.00	\$275.00
07/12/2018	NPL	CO	Finalize evidentiary objection to declaration of T. Hamilton regarding supplemental opposition to motion to strike.	0.30	250.00	\$75.00
07/12/2018	NPL	CO	Finalize proposed finding of facts and conclusions of law regarding motion to strike Beitler parties' claims.	0.40	250.00	\$100.00
07/12/2018	NPL	CO	Prepare appendix of unpublished cases in support of supplemental brief regarding disallowance of Beitler parties' claims and motion to strike; forward same to A. Friedman for review.	0.60	250.00	\$150.00
07/12/2018	NPL	CO	Lexis research regarding unpublished cases regarding supplemental brief regarding disallowance of Beitler parties' claims and motion to strike.	0.60	250.00	\$150.00
07/12/2018	NPL	CO	Revise and finalize appendix of unpublished cases regarding supplemental brief regarding disallowance of Beitler parties' claims and motion to strike.	0.40	250.00	\$100.00
07/12/2018	NPL	CO	Revise and finalize motion to strike declarations.	0.60	250.00	\$150.00
07/12/2018	NPL	CO	Revise and finalize request for judicial notice regarding motion to strike declarations.	0.60	250.00	\$150.00
07/12/2018	NPL	CO	Revise and finalize appendix of unpublished cases regarding motion to strike declarations.	0.30	250.00	\$75.00
07/12/2018	NPL	CO	Revise and finalize application for an order shortening time regarding motion to strike declarations.	0.40	250.00	\$100.00
07/12/2018	NPL	CO	Finalize declaration of A. Friedman in support of application for order shortening time regarding motion to strike declarations.	0.30	250.00	\$75.00
07/12/2018	NPL	CO	Revise order shortening time regarding application for order shortening time regarding motion to strike declarations.	0.40	250.00	\$100.00
07/12/2018	NPL	CO	Draft email to L. Gauthier regarding order	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			shortening time regarding application for order shortening time regarding motion to strike declarations; review email from L. Gauthier regarding same.			
07/13/2018	WNL	CO	Telephone conversation with A. Friedman re: various pending issues.	0.40	850.00	\$340.00
07/13/2018	WNL	CO	Review Supplemental Notice of Hearing On Shortened Time on Motion to Strike Beitler Creditors Declarations and Portions of their Supplemental Opposition	0.10	850.00	\$85.00
07/13/2018	WNL	CO	Receipt of telephonic notice from Court re: service of Order Shortening Time re: Motion to Strike Declarations.	0.10	850.00	\$85.00
07/13/2018	WNL	CO	Review pleadings re: Motion to Strike Claims and Response thereto.	0.50	850.00	\$425.00
07/13/2018	NPL	CO	Revise and finalize order shortening time regarding application for an order shortening time regarding motion to strike declarations.	0.60	250.00	\$150.00
07/13/2018	NPL	CO	Review and reply to email from L. Gauthier regarding order shortening time regarding motion to strike declarations.	0.10	250.00	\$25.00
07/13/2018	NPL	CO	Review docket regarding objection to Beitler Parties's claims; prepare counsel for hearing on same.	1.40	250.00	\$350.00
07/13/2018	NPL	CO	Prepare counsel for hearing on motion to compel additional responses from Beitler parties.	0.60	250.00	\$150.00
07/13/2018	NPL	CO	Telephone call with J. O'Keefe regarding entered order on application for an order shortening time on motion to strike declarations.	0.40	250.00	\$100.00
07/13/2018	NPL	CO	Telephone call with A. Friedman regarding entered order on application for an order shortening time on motion to strike declarations.	0.20	250.00	\$50.00
07/13/2018	NPL	CO	Review entered order on application for an order shortening time on motion to strike declarations.	0.30	250.00	\$75.00
07/13/2018	NPL	CO	Telephone call with J. O'Keefe regarding written notice of hearing on motion to strike declarations.	0.30	250.00	\$75.00
07/13/2018	NPL	CO	Review email from J. O'Keefe regarding written notice of hearing on motion to strike declarations.	0.10	250.00	\$25.00
07/13/2018	NPL	CO	Prepare supplemental notice of hearing on shortened notice regarding motion to strike claims; forward same to A. Friedman for review.	1.30	250.00	\$325.00
07/13/2018	NPL	CO	Multiple revisions made with A. Friedman to supplemental notice of hearing on shortened notice regarding motion to strike declarations.	0.70	250.00	\$175.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/13/2018	NPL	CO	Finalize supplemental notice of hearing on shortened time regarding motion to strike declarations.	0.50	250.00	\$125.00
07/13/2018	NPL	CO	Draft email to interested parties regarding supplemental notice on shortened time regarding motion to strike declarations.	0.20	250.00	\$50.00
07/13/2018	SAO	CO	Conference call with A. Friedman re preparations for hearing on motion to strike claims.	0.40	750.00	\$300.00
07/14/2018	WNL	CO	Review correspondence re: issues concerning Findings of Fact and Conclusions of Law.	0.10	850.00	\$85.00
07/14/2018	WNL	CO	Review all documents served pursuant to Court Order Shortening Time re: Evidentiary Objections.	0.60	850.00	\$510.00
07/14/2018	WNL	CO	Review correspondence re: potential Reply to Opposition to Motion to Strike Declarations.	0.10	850.00	\$85.00
07/14/2018	WNL	CO	Review additional correspondence re: Reply to Opposition to Motion to Strike Declarations.	0.10	850.00	\$85.00
07/14/2018	WNL	CO	Review additional correspondence re: Findings of Fact and Conclusions of Law.	0.20	850.00	\$170.00
07/14/2018	WNL	CO	Confer with A. Friedman re: inconsistencies in testimony of Beitler representatives.	0.30	850.00	\$255.00
07/14/2018	WNL	CO	Review correspondence re: service of papers on the Court.	0.10	850.00	\$85.00
07/14/2018	WNL	CO	Review Motion to Strike Declarations of Tom Lallas and Timothy Hamilton.	0.40	850.00	\$340.00
07/14/2018	WNL	CO	Review unpublished opinions in support of Motion to Strike Declarations.	0.80	850.00	\$680.00
07/16/2018	WNL	CO	Review draft declaration of N. Lockwood and telephone call with A. Friedman re: declaration and associated service issues.	0.50	850.00	\$425.00
07/16/2018	WNL	CO	Review additional correspondence re: service issues.	0.10	850.00	\$85.00
07/16/2018	WNL	CO	Review declaration of Jennifer O'Keefe re: Service of Notice if Hearing.	0.10	850.00	\$85.00
07/16/2018	NPL	CO	Conference with A. Friedman regarding motion to strike declarations; review docket regarding same.	0.20	250.00	\$50.00
07/16/2018	NPL	CO	Prepare declaration of J. O'Keefe regarding notice of hearing on shortened time regarding motion to strike declarations; confer with A. Friedman regarding revisions to same.	0.70	250.00	\$175.00
07/16/2018	NPL	CO	Review and reply to email from J. O'Keefe regarding declaration of J. O'Keefe regarding notice of hearing on shortened time regarding motion to strike declarations.	0.10	250.00	\$25.00
07/16/2018	NPL	CO	Revise and finalize declaration of J. O'Keefe regarding notice of hearing on shortened time regarding motion to strike declarations.	0.60	250.00	\$150.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/16/2018	NPL	CO	Review and reply to email from A. Friedman regarding chambers request for pleadings.	0.40	250.00	\$100.00
07/16/2018	NPL	CO	Draft declaration of N. Lockwood regarding service of pleadings related to notice of hearing on shortened time regarding motion to strike declarations; forward same to A. Friedman for review.	1.20	250.00	\$300.00
07/16/2018	NPL	CO	Review and reply to email from A. Friedman regarding revised declaration of N. Lockwood regarding notice of hearing on shortened time regarding motion to strike declarations.	0.20	250.00	\$50.00
07/16/2018	NPL	CO	Prepare corrected appendix of unpublished cases regarding motion to strike declarations.	0.30	250.00	\$75.00
07/16/2018	NPL	CO	Confer with W. Lobel regarding pleadings related to motion to strike declarations.	0.10	250.00	\$25.00
07/16/2018	SAO	CO	Review statement of undisputed facts and reply re motion to strike in preparation for strategy meeting re hearing on July 19, 2018.	1.20	750.00	\$900.00
07/16/2018	SAO	CO	Attend meeting A. Friedman and W. Lobel re preparations for hearing on motion to strike claims; motion to convert case; disclosure statement hearing.	1.90	750.00	\$1,425.00
07/17/2018	WNL	CO	Review and analyze Beitler Parties Objection to Application to ex parte Motion to Strike Declarations on Shortened Notice.	0.10	850.00	\$85.00
07/17/2018	WNL	CO	review correspondence re: new filing by Beitler Parties.	0.10	850.00	\$85.00
07/17/2018	WNL	CO	Review and analyze correspondence re: documents requested by the Court.	0.10	850.00	\$85.00
07/17/2018	WNL	CO	Review and respond to correspondence re: Beitler responses to Court's request for documents.	0.10	850.00	\$85.00
07/17/2018	WNL	CO	Review additional correspondence re: documents requested by the Court.	0.10	850.00	\$85.00
07/17/2018	WNL	CO	Review correspondence re: service issues.	0.10	850.00	\$85.00
07/17/2018	WNL	CO	Review correspondence and confer with N. Lockwood re: service issues.	0.10	850.00	\$85.00
07/17/2018	WNL	CO	Review amended declaration of N. Lockwood and related correspondence.	0.10	850.00	\$85.00
07/17/2018	WNL	CO	Analyze arguments re: Motion to Strike Claims.	0.80	850.00	\$680.00
07/17/2018	NPL	CO	Revisions to declaration of N. Lockwood regarding notice of hearing on shortened notice regarding motion to strike declarations.	0.60	250.00	\$150.00
07/17/2018	NPL	CO	Prepare corrected appendix of unpublished cases; forward same to A. Friedman for review.	0.40	250.00	\$100.00

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07/17/2018	NPL	CO	Revise and finalize Declaration of Nancy Lockwood regarding notice of hearing on shortened time regarding motion to strike declarations.	0.70	250.00	\$175.00
07/17/2018	NPL	CO	Revise and file corrected appendix of unpublished cases regarding motion to strike declarations.	0.60	250.00	\$150.00
07/17/2018	NPL	CO	Review and reply to multiple emails from A. Friedman regarding corrected appendix of cases and declaration of N. Lockwood.	0.20	250.00	\$50.00
07/17/2018	NPL	CO	Telephone call with L. Gauthier regarding declaration of N. Lockwood regarding motion to strike declarations.	0.10	250.00	\$25.00
07/17/2018	NPL	CO	Telephone call with chambers regarding courtesy copies of motion and supporting pleadings regarding motion to strike declarations.	0.20	250.00	\$50.00
07/17/2018	NPL	CO	Draft email to A. Friedman and W. Lobel regarding courtesy copies of motion to strike declarations to chambers.	0.10	250.00	\$25.00
07/17/2018	SAO	CO	Review record re motion to strike claims and make notes for closing argument.	2.50	750.00	\$1,875.00
07/18/2018	WNL	CO	Review and consider arguments in Reply to Motion to Strike Declarations.	0.40	850.00	\$340.00
07/18/2018	WNL	CO	Telephone call with John Bral re: pending hearing on Motion to Strike Claims.	0.20	850.00	\$170.00
07/18/2018	WNL	CO	Review and analyze comments to Beitler Parties Opposition to Bral's Motion to Strike Declarations.	0.80	850.00	\$680.00
07/18/2018	WNL	CO	Analyze arguments and legal cases re: Objections to Claims.	1.60	850.00	\$1,360.00
07/18/2018	NPL	CO	Review for tentative rulings on claim objection, motion to convert case, and approval of second amended disclosure statement.	0.20	250.00	\$50.00
07/18/2018	NPL	CO	Review opposition to motion to strike declarations.	0.20	250.00	\$50.00
07/18/2018	SAO	CO	Draft oral argument with evidentiary citations for closing argument on motion to strike claims	2.40	750.00	\$1,800.00
07/18/2018	SAO	CO	Conference call with A. Friedman re preparations for and strategy re hearing on 7/18/2018 re motion to strike claims.	0.30	750.00	\$225.00
07/18/2018	SAO	CO	Review pleadings of record as part of preparation of closing argument presentation on motion to strike claims.	4.10	750.00	\$3,075.00
07/19/2018	WNL	CO	Review correspondence re: Order Denying Motion to Strike Declarations.	0.10	850.00	\$85.00
07/19/2018	NPL	CO	Review entered order denying motion to strike declarations.	0.20	250.00	\$50.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/20/2018	WNL	CO	Review correspondence re: financial issues and alternatives.	0.10	850.00	\$85.00
07/20/2018	WNL	CO	Telephone call with J. Bral re: settlement and related issues.	0.30	850.00	\$255.00
07/20/2018	WNL	CO	Telephone call with A. Friedmann re: settlement and related issues.	0.20	850.00	\$170.00
07/20/2018	WNL	CO	Review correspondence re: scheduling issues and mediation issues.	0.10	850.00	\$85.00
07/20/2018	WNL	CO	Review correspondence re: Scheduling Order.	0.10	850.00	\$85.00
07/20/2018	WNL	CO	Review additional correspondence re: Scheduling Order and mediation.	0.10	850.00	\$85.00
07/20/2018	WNL	CO	Review Javaher Operating Agreement re: relevant issues.	0.20	850.00	\$170.00
07/20/2018	NPL	CO	Review entered order requiring mandatory mediation; attention to dates and deadlines regarding same.	0.20	250.00	\$50.00
07/22/2018	TCF	CO	Review and analysis of issues regarding Steward motion to dismiss non-dischargeability action.	0.10	650.00	\$65.00
07/22/2018	TCF	CO	Review and revise Steward motion to dismiss non-dischargeability action.	0.30	650.00	\$195.00
07/22/2018	TCF	CO	Correspond with team regarding Steward motion to dismiss.	0.10	650.00	\$65.00
07/23/2018	TCF	CO	Review and analysis regarding Steward motion to dismiss; correspond with team regarding same.	0.60	650.00	\$390.00
07/23/2018	TCF	CO	Telephone conference with A. Friedman regarding Steward motion to dismiss and related issues.	0.10	650.00	\$65.00
07/23/2018	NPL	CO	Review email from H. Martens of Briggs reporting regarding status of transcript of hearing on claim objections; draft email to L. Gauthier regarding same.	0.10	250.00	\$25.00
07/23/2018	NPL	CO	Review email from A. Friedman regarding issues related to hearings on claim objections and second amended disclosure statement.	0.10	250.00	\$25.00
07/24/2018	WNL	CO	Review correspondence re: Judge Bluebond as a mediator.	0.10	850.00	\$85.00
07/24/2018	WNL	CO	Telephone call with A. Friedman re: mediation and settlement issues.	0.20	850.00	\$170.00
07/24/2018	WNL	CO	Review correspondence re: mediation issues.	0.10	850.00	\$85.00
07/24/2018	WNL	CO	Review and respond to correspondence re: potential mediation.	0.10	850.00	\$85.00
07/24/2018	WNL	CO	Review additional correspondence re: mediation issues.	0.10	850.00	\$85.00
07/24/2018	WNL	CO	Review correspondence re: claim estimation issues.	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/24/2018	WNL	CO	Review and analyze Motion To Dismiss Non-Dischargeability Claim	0.90	850.00	\$765.00
07/25/2018	WNL	CO	Review draft revised settlement proposal to Gary Klausner.	0.10	850.00	\$85.00
07/25/2018	WNL	CO	Telephone call with A. Friedman re: revised settlement proposal.	0.10	850.00	\$85.00
07/25/2018	WNL	CO	Review correspondence re: changed to order made by the Court.	0.10	850.00	\$85.00
07/25/2018	WNL	CO	Review and respond to correspondence re: settlement terms and issues.	0.10	850.00	\$85.00
07/25/2018	WNL	CO	Review and analyze transcript of July 19 hearings.	0.90	850.00	\$765.00
07/25/2018	WNL	CO	Review correspondence re: telephone call with Judge Jury.	0.10	850.00	\$85.00
07/25/2018	WNL	CO	Review and respond to correspondence re: potential mediation.	0.10	850.00	\$85.00
07/25/2018	WNL	CO	Review additional correspondence re: settlement and mediation issues.	0.20	850.00	\$170.00
07/25/2018	WNL	CO	Review correspondence and analyze issues re:revised settlement proposal to Beitler.	0.20	850.00	\$170.00
07/25/2018	WNL	CO	Review additional correspondence re: revised settlement proposal.	0.10	850.00	\$85.00
07/25/2018	NPL	CO	Review and reply to email from H. Martens regarding transcript for hearing on multiple motions, including motion to strike; forward same to A. Friedman and W. Lobel for review.	0.10	250.00	\$25.00
07/26/2018	TCF	CO	Review and analysis of issues regarding motion to strike claims.	0.20	650.00	\$130.00
07/26/2018	TCF	CO	Review and analysis of issues regarding Steward motion to dismiss.	0.10	650.00	\$65.00
07/26/2018	WNL	CO	Telephone call with A. Friedman re: settlement and mediation issues.	0.30	850.00	\$255.00
07/26/2018	WNL	CO	Review correspondence re: mediation issues.	0.20	850.00	\$170.00
07/26/2018	NPL	CO	Draft email to Judge Jury regarding mediation for motion for disallowance of claims.	0.20	250.00	\$50.00
07/27/2018	WNL	CO	Review correspondence re: pending mediation.	0.10	850.00	\$85.00
07/30/2018	WNL	CO	Telephone call with Alan Friedman re: stipulation to estimate claims for voting purposes.	0.20	850.00	\$170.00
07/30/2018	WNL	CO	Review and analyze documents given to the mediator .	0.20	850.00	\$170.00
07/31/2018	TCF	CO	Correspondence with team regarding motion to dismiss re: Steward claim.	0.10	650.00	\$65.00
07/31/2018	TCF	CO	Attend to plan confirmation issues.	0.40	650.00	\$260.00

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79.30 **\$49,595.00**

Fees of Professionals

07/02/2018	NPL	F	Review and analysis of professional fees.	0.30	250.00	\$75.00
07/17/2018	NPL	F	Review and analysis of professional fees of Pachulski Stang Ziehl & Jones for July 2018.	0.80	250.00	\$200.00
07/23/2018	NPL	F	Review email from A. Friedman regarding professional fees of Pachulski Stang Ziehl & Jones; attention to same.	0.30	250.00	\$75.00
				1.40		\$350.00

Fee/Employment Application

07/20/2018	WNL	FE	Review correspondnce re> pending unpaid professional fees.	0.10	850.00	\$85.00
07/20/2018	WNL	FE	Review additional correspondence re; payment of professional fees.	0.10	850.00	\$85.00
07/20/2018	WNL	FE	Review correspondence re: Glass Ratner retention,agreement.	0.10	850.00	\$85.00
07/23/2018	WNL	FE	Review correspondence and telephone call with A. Friedman re: amounts owed to professionals.	0.20	850.00	\$170.00
07/26/2018	WNL	FE	Review correspondence re: validity of post confirmation lien for attorneys' fees.	0.10	850.00	\$85.00
				0.60		\$510.00

Litigation

07/12/2018	NPL	L	Review emails regarding Westcliff distribution.	0.10	250.00	\$25.00
07/13/2018	NPL	L	Review emails regarding Westcliff distributions.	0.10	250.00	\$25.00
				0.20		\$50.00

Litigation (Non-Bankruptcy)

07/03/2018	WNL	LN	review correspondence re: status report in non-bankruptcy litigation.	0.10	850.00	\$85.00
07/24/2018	WNL	LN	Review correspondence re: stay issues.	0.20	850.00	\$170.00
07/31/2018	WNL	LN	Review correspondence re: sanctions for non-dischargeability complaint.	0.10	850.00	\$85.00
				0.40		\$340.00

Plan & Disclosure Stmt. [B320]

07/04/2018	TCF	PD	Research regarding disclosure statement objections.	0.60	650.00	\$390.00
07/05/2018	TCF	PD	Research and analysis and drafting of reply to	4.80	650.00	\$3,120.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			disclosure statement objections.			
07/05/2018	TCF	PD	Drafting of reply to disclosure statement objections.	4.20	650.00	\$2,730.00
07/06/2018	WNL	PD	Analyze confirmation issues and possible conversion of case.	0.90	850.00	\$765.00
07/06/2018	WNL	PD	Review correspondence re: Reply to Objection to Disclosure Statement.	0.10	850.00	\$85.00
07/06/2018	WNL	PD	Review correspondence re: Reply to Objection to Disclosure Statement.	0.10	850.00	\$85.00
07/06/2018	WNL	PD	Analyze alternative settlement alternatives and potential strategy.	0.80	850.00	\$680.00
07/06/2018	TCF	PD	Draft disclosure statement reply; research with respect thereto	6.80	650.00	\$4,420.00
07/06/2018	TCF	PD	Correspondence with A. Friedman regarding reply to disclosure statement objection.	0.10	650.00	\$65.00
07/06/2018	TCF	PD	Correspondence with w. Lobel regarding reply to disclosure statement objection.	0.10	650.00	\$65.00
07/06/2018	TCF	PD	Research regarding disclosure statement objections.	1.20	650.00	\$780.00
07/07/2018	WNL	PD	Review and analyze first draft of Reply to Objection to Second Amended Disclosure Statement.	1.40	850.00	\$1,190.00
07/07/2018	WNL	PD	Review comments and correspondence on draft of Reply to objection to Disclosure Statement.	0.20	850.00	\$170.00
07/09/2018	WNL	PD	Telephone call with A. Friedman re: Response to Objections to Disclosure Statement.	0.20	850.00	\$170.00
07/09/2018	WNL	PD	Review draft Reply to Beitler Objections to Disclosure Statement.	1.30	850.00	\$1,105.00
07/09/2018	WNL	PD	Review arguments and analyze legal precedents re: confirmation issues.	0.60	850.00	\$510.00
07/10/2018	WNL	PD	Analyze arguments and facts and legal precedent re: Disclosure Statement and confirmation issues.	1.80	850.00	\$1,530.00
07/11/2018	WNL	PD	review correspondence re: Disclosure Statement issues.	0.30	850.00	\$255.00
07/11/2018	WNL	PD	Telephone calls with A. Friedman re: Objections to Disclosure Statement.	0.30	850.00	\$255.00
07/11/2018	WNL	PD	Review Plan and Disclosure Statement in consideration of objections to Disclosure Statement and plan confirmation.	1.90	850.00	\$1,615.00
07/11/2018	WNL	PD	Analyze plan confirmation and potential objection issues.	1.70	850.00	\$1,445.00
07/11/2018	NPL	PD	Draft email to L. Gauthier regarding reply to objection to second amended disclosure statement.	0.10	250.00	\$25.00
07/11/2018	NPL	PD	Research and review unpublished cases regarding reply to objection to second amended disclosure statement.	0.30	250.00	\$75.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/11/2018	NPL	PD	Prepare appendix of unpublished cases in support of reply to objection to second amended disclosure statement.	0.40	250.00	\$100.00
07/11/2018	NPL	PD	Draft email to A. Friedman regarding appendix of unpublished cases regarding reply to objection to second amended disclosure statement and motion to strike declarations of Lallas and Hurwitz.	0.10	250.00	\$25.00
07/11/2018	NPL	PD	Review reply to objection to second amended disclosure statement and appendix in support of same for filing.	0.20	250.00	\$50.00
07/12/2018	NPL	PD	Draft email to L. Gauthier regarding reply to objection to second amended disclosure statement; review and reply to email from L. Gauthier regarding same.	0.10	250.00	\$25.00
07/12/2018	NPL	PD	Draft email to L. Gauthier regarding revised reply to objection to second amended disclosure statement; review and reply to email from L. Gauthier regarding same.	0.20	250.00	\$50.00
07/12/2018	NPL	PD	Review and reply to email from A. Friedman regarding reply to objection to second amended disclosure statement.	0.10	250.00	\$25.00
07/12/2018	NPL	PD	Review and reply to email from A. Friedman regarding reply to objection to second amended disclosure statement.	0.10	250.00	\$25.00
07/12/2018	NPL	PD	Revise and finalize reply to objection to second amended disclosure statement.	0.60	250.00	\$150.00
07/12/2018	NPL	PD	Revise and finalize appendix of unpublished cases in support of reply to objection to second amended disclosure statement.	0.40	250.00	\$100.00
07/13/2018	WNL	PD	Review cases relevant to Opposition to Disclosure Statement and consider ramifications on pending issues.	1.70	850.00	\$1,445.00
07/13/2018	NPL	PD	Prepare counsel for hearing on second amended disclosure statement.	0.80	250.00	\$200.00
07/14/2018	WNL	PD	Review Plan, Disclosure Statement and pleadings re: objection to Approval of Disclosure Statement.	3.60	850.00	\$3,060.00
07/16/2018	WNL	PD	Confer with A. Friedman and S. O'Keefe re: preparation for hearing on Objections to Second Amended Disclosure Statement.	2.00	850.00	\$1,700.00
07/17/2018	WNL	PD	Review pleadings and revise arguments for pending hearing on approval of Disclosure Statement.	0.90	850.00	\$765.00
07/17/2018	WNL	PD	Analyze arguments re: Objection to Disclosure Statement.	0.70	850.00	\$595.00
07/18/2018	WNL	PD	Telephone call with A. Friedman re: Court's tentative rulings.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/19/2018	WNL	PD	Finalize preparation for hearing and attendance at hearing on Objection to Disclosure Statement and related matters.	4.60	850.00	\$3,910.00
07/19/2018	WNL	PD	Review and consider implications of Order requiring mediation.	0.10	850.00	\$85.00
07/19/2018	TCF	PD	Review and analysis of issues regarding approval of disclosure statement and objections thereto.	0.60	650.00	\$390.00
07/19/2018	NPL	PD	Assist W. Lobel in preparation of hearing on second amended disclosure statement; review multiple pleadings regarding same.	0.60	250.00	\$150.00
07/20/2018	WNL	PD	Review correspondence re: creditor and employee issues.	0.10	850.00	\$85.00
07/20/2018	WNL	PD	Review correspondence re: plan scheduling order.	0.10	850.00	\$85.00
07/20/2018	WNL	PD	Review additional correspondence re: schedule for plan confirmation.	0.20	850.00	\$170.00
07/20/2018	WNL	PD	Review correspondence re: telephone conversation with G. Klausner and related settlement issues.	0.10	850.00	\$85.00
07/20/2018	WNL	PD	Review correspondence re: potential mediators.	0.10	850.00	\$85.00
07/20/2018	WNL	PD	Review additional correspondence re: pending mediation.	0.10	850.00	\$85.00
07/20/2018	WNL	PD	Analyze evidentiary issues and burdens re: confirmation of plan.	0.90	850.00	\$765.00
07/20/2018	TCF	PD	Telephone conference with A. Friedman regarding motion to strike, plan and disclosure statement hearing and issues.	0.40	650.00	\$260.00
07/20/2018	TCF	PD	Telephone conference with W. Lobel regarding plan and disclosure statement hearing and issues.	0.20	650.00	\$130.00
07/20/2018	NPL	PD	Review electronic notice regarding hearing on plan confirmation; attention to dates and deadlines regarding same.	0.20	250.00	\$50.00
07/20/2018	NPL	PD	Review email from A. Friedman to G. Kalusner regarding scheduling order.	0.10	250.00	\$25.00
07/23/2018	WNL	PD	Review correspondence re: revised dates for plan scheduling order.	0.10	850.00	\$85.00
07/23/2018	WNL	PD	Review correspondence re: scheduling issues.	0.20	850.00	\$170.00
07/23/2018	WNL	PD	Review additional correspondence re: Steward non-dischargeability complaint.	0.10	850.00	\$85.00
07/23/2018	WNL	PD	Review correspondence re: settlement issues.	0.10	850.00	\$85.00
07/23/2018	WNL	PD	Review correspondence re: mediation issues.	0.20	850.00	\$170.00
07/23/2018	WNL	PD	Review correspondence re: plan and disclosure statement issues.	0.20	850.00	\$170.00
07/23/2018	WNL	PD	Review correspondence re: scheduling issues.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/23/2018	WNL	PD	Review additional correspondence re: scheduling issues.	0.20	850.00	\$170.00
07/23/2018	WNL	PD	Review correspondence re: plan issues.	0.20	850.00	\$170.00
07/23/2018	WNL	PD	Review additional correspondence re: disclosure statement issues.	0.20	850.00	\$170.00
07/23/2018	WNL	PD	Review additional correspondence re: plan numbers and related issues.	0.20	850.00	\$170.00
07/23/2018	WNL	PD	Review correspondence re: settlement proposal to Barry Beitler.	0.20	850.00	\$170.00
07/23/2018	WNL	PD	Review additional correspondence re: settlement proposal.	0.10	850.00	\$85.00
07/23/2018	WNL	PD	Review correspondence re: specifics of settlement proposal to Barry Beitler.	0.20	850.00	\$170.00
07/23/2018	WNL	PD	Review and analyze draft settlement proposal.	0.30	850.00	\$255.00
07/23/2018	TCF	PD	Telephone conference with A. Friedman regarding plan and related issues.	0.10	650.00	\$65.00
07/23/2018	NPL	PD	Review email from A. Friedman regarding plan confirmation packets; review and reply to email from L. Gauthier regarding same.	0.20	250.00	\$50.00
07/23/2018	NPL	PD	Telephone call with L. Gauthier regarding plan confirmation packets.	0.10	250.00	\$25.00
07/23/2018	NPL	PD	Review email from A. Friedman regarding proposed dates for plan confirmation process.	0.10	250.00	\$25.00
07/23/2018	NPL	PD	Review multiple emails between A. Friedman and G. Klausner regarding plan scheduling order.	0.20	250.00	\$50.00
07/24/2018	NPL	PD	Review and reply to email from L. Gauthier regarding plan ballots.	0.10	250.00	\$25.00
07/24/2018	WNL	PD	Review final version of sStipulation Regarding Deadlines to Confirmation.	0.10	850.00	\$85.00
07/24/2018	WNL	PD	Review correspondence re: settlement proposals.	0.20	850.00	\$170.00
07/24/2018	TCF	PD	Review and revise plan and ballots.	0.40	650.00	\$260.00
07/24/2018	TCF	PD	Correspondence with L. Gauthier regarding plan confirmation issues and ballots.	0.10	650.00	\$65.00
07/24/2018	TCF	PD	Correspondence with A. Friedman regarding plan confirmation issues.	0.10	650.00	\$65.00
07/24/2018	TCF	PD	Review and revise notice of confirmation hearing.	0.10	650.00	\$65.00
07/24/2018	TCF	PD	Communication with L. Gauthier regarding confirmation hearing and related matters.	0.10	650.00	\$65.00
07/24/2018	TCF	PD	Review and analysis of confirmation hearing schedule and related matters.	0.20	650.00	\$130.00
07/24/2018	NPL	PD	Review and reply to email from L. Gauthier regarding scheduling order for plan confirmation.	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/24/2018	NPL	PD	Review stipulation regarding confirmation deadlines; attention to same.	0.20	250.00	\$50.00
07/25/2018	WNL	PD	Review stipulation and order re: deadlines in plan confirmation process.	0.10	850.00	\$85.00
07/25/2018	WNL	PD	Review correspondence re: order on disclosure statement order.	0.10	850.00	\$85.00
07/25/2018	TCF	PD	Review and analysis of plan confirmation issues, claim estimation and related matters.	0.40	650.00	\$260.00
07/25/2018	TCF	PD	Telephone conference with A. Friedman regarding plan confirmation issues, claim estimation and related matters.	0.40	650.00	\$260.00
07/25/2018	TCF	PD	Review and analysis of various correspondence regarding mediation and settlement proposal.	0.10	650.00	\$65.00
07/25/2018	NPL	PD	Review and reply to email from L. Gauthier regarding order approving disclosure statement.	0.10	250.00	\$25.00
07/25/2018	NPL	PD	Review entered order approving plan confirmation stipulation.	0.10	250.00	\$25.00
07/25/2018	NPL	PD	Draft email to A. Friedman regarding order approving disclosure statement.	0.10	250.00	\$25.00
07/25/2018	NPL	PD	Review and revise order approving disclosure statement; draft email to A. Friedman regarding same	0.20	250.00	\$50.00
07/25/2018	NPL	PD	Review and reply to email from A. Friedman regarding order approving disclosure statement.	0.10	250.00	\$25.00
07/25/2018	NPL	PD	Finalize order approving second amended disclosure statement.	0.20	250.00	\$50.00
07/25/2018	NPL	PD	Draft email to L. Gauthier confirming lodging of order approving second amended disclosure statement.	0.10	250.00	\$25.00
07/26/2018	WNL	PD	Conference call with Judge Jury, G. Klausner and T. Lallas re: mediation issues.	0.50	850.00	\$425.00
07/26/2018	WNL	PD	Review correspondence re: documents to be sent to Judge Jury.	0.10	850.00	\$85.00
07/26/2018	WNL	PD	Second call with A. Friedman re: settlement and mediation issues.	0.20	850.00	\$170.00
07/26/2018	WNL	PD	Review and respond to correspondence re: documents to be delivered to mediator.	0.10	850.00	\$85.00
07/26/2018	TCF	PD	Review and analysis of transcript of hearing on approval of disclosure statement.	0.30	650.00	\$195.00
07/26/2018	TCF	PD	Correspond with team regarding counsel on issue of attorneys' lien granted under plan.	0.10	650.00	\$65.00
07/26/2018	TCF	PD	Review and analysis of issues regarding approval of disclosure statement; plan solicitation packages and	0.20	650.00	\$130.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			related issues.			
07/26/2018	TCF	PD	Attend to plan confirmation matters.	0.20	650.00	\$130.00
07/26/2018	TCF	PD	Review and analysis of order approving stipulation re: plan dates and deadlines.	0.10	650.00	\$65.00
07/26/2018	TCF	PD	Review and analysis of confirmation related matters.	0.20	650.00	\$130.00
07/26/2018	NPL	PD	Review email from T. Flanagan regarding professional fees related to plan confirmation.	0.10	250.00	\$25.00
07/27/2018	TCF	PD	Review and analysis of order approving disclosure statement.	0.10	650.00	\$65.00
07/30/2018	WNL	PD	Review proposed stipulation to estimate claims for voting purposes.	0.10	850.00	\$85.00
07/30/2018	WNL	PD	Review and respond to correspondence re: stipulation to estimate claims.	0.10	850.00	\$85.00
07/31/2018	NPL	PD	Review and reply to email from L. Gauthier regarding plan packets.	0.10	250.00	\$25.00
07/31/2018	WNL	PD	review correspondence re: request for allowance of claims for voting purposes.	0.10	850.00	\$85.00
07/31/2018	WNL	PD	review correspondence re: rule 11 issues.	0.20	850.00	\$170.00
07/31/2018	WNL	PD	Review correspondence re: status of stipulation re: temporarily allowing claims for voting purposes.	0.10	850.00	\$85.00
07/31/2018	WNL	PD	Review correspondence re: specific terms of plan.	0.20	850.00	\$170.00
07/31/2018	WNL	PD	Analyze and consider alternatives re: plan structure and claims issues.	0.70	850.00	\$595.00
07/31/2018	TCF	PD	Review and analysis of plan solicitation issues and packages.	0.30	650.00	\$195.00
07/31/2018	TCF	PD	Correspondence with team regarding plan issues and attorney lien.	0.10	650.00	\$65.00
					61.40	\$43,830.00

TOTAL SERVICES FOR THIS MATTER:

\$120,280.00

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Expenses

12/29/2017	OS	JAMS, Inv. 12200531162, WNL	114.16
01/31/2018	OS	JAMS, Inv. 12200531162, WNL	428.40
04/30/2018	OS	JAMS, Inv. 12200531162, WNL	124.43
06/08/2018	SO	Secretarial Overtime- G. Downing	185.79
07/05/2018	PO	Postage [E108] Courtsey Copies to Santa Ana BK of Opposition to Motion, WNL	44.75
07/12/2018	PO	Postage [E108] Courtsey Copies to Chambers of multiple filings done that day, WNL	28.17
07/13/2018	PO	Postage [E108] Courtesy Copies to Chambers of multiple filings done that day, WNL	15.43
07/13/2018	SO	Secretarial Overtime - J. O'Keefe	61.58
07/13/2018	TR	Transcript [E116] Briggs Reporting Company (copies), WNL	28.10
07/16/2018	BM	Business Meal [E111] Maggianos Restaurant, working meal (+3ppl) WNL	101.90
07/16/2018	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
07/16/2018	RE2	SCAN/COPY (19 @0.10 PER PG)	1.90
07/16/2018	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
07/16/2018	RE2	SCAN/COPY (19 @0.10 PER PG)	1.90
07/16/2018	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
07/16/2018	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
07/16/2018	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
07/16/2018	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
07/16/2018	RE2	SCAN/COPY (84 @0.10 PER PG)	8.40

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07/16/2018	RE2	SCAN/COPY (27 @0.10 PER PG)	2.70
07/16/2018	RE2	SCAN/COPY (84 @0.10 PER PG)	8.40
07/16/2018	RE2	SCAN/COPY (43 @0.10 PER PG)	4.30
07/16/2018	RE2	SCAN/COPY (40 @0.10 PER PG)	4.00
07/16/2018	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
07/16/2018	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
07/17/2018	RE2	SCAN/COPY (18 @0.10 PER PG)	1.80
07/17/2018	RE2	SCAN/COPY (43 @0.10 PER PG)	4.30
07/18/2018	OS	Access Appraisals, Inv. 0418Brai, (Orig. Date 4/20/18), J. O'Keefe	450.00
07/18/2018	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
07/19/2018	BM	Business Meal [E111] Fleenors on 4th, working conference lunch with A. Friedman, S. O'Keefe and A. Meislike after Bral hearings, WNL	107.67
07/19/2018	PO	Postage [E108]	18.17
07/19/2018	RE2	SCAN/COPY (34 @0.10 PER PG)	3.40
07/19/2018	RE2	SCAN/COPY (45 @0.10 PER PG)	4.50
07/20/2018	PO	Postage [E108] JMO	0.89
07/23/2018	OS	Drop Off Inc., Inv. F36CWV16MT deliver same day courtesy copies of: Motion to Strike Declarations on 7/16/18, WNL	134.96
07/25/2018	PO	Postage [E108] Courtsey Copies to Chambers of Order Granting Stip Re Deadlines Relating to Confirmation. WNL	15.43
07/26/2018	TR	Transcript [E116] Briggs Reporting Company, Inc., Inv. 19451, N. Lockwood	62.40
07/31/2018	PAC	Pacer - Court Research	120.80

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Total Expenses for this Matter **\$2,092.83**

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REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For current services rendered through 07/31/2018

Total Fees	\$120,280.00
Chargeable costs and disbursements	\$2,092.83
Total Due on Current Invoice.....	\$122,372.83

Outstanding Balance from prior Invoices as of 07/31/2018 **(May not reflect recent payments)**

Invoice Number	Invoice Date	Fees Billed	Expenses Billed	Balance Due
118521	01/31/2018	\$64,977.50	\$1.40	\$64,978.90
118768	02/28/2018	\$89,105.00	\$6,717.72	\$95,822.72
119267	03/31/2018	\$170,795.00	\$818.42	\$171,613.42
119338	04/30/2018	\$241,285.00	\$12,901.06	\$254,186.06
119732	06/13/2018	\$165,330.00	\$2,241.54	\$167,571.54
119915	06/30/2018	\$127,527.50	\$476.66	\$128,004.16
Total Amount Due on Current and Prior Invoices				\$1,004,549.63

Pachulski Stang Ziehl & Jones LLP

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

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Client 10601
Matter 00001
WNL

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 08/31/2018

FEES	\$83,337.00
EXPENSES	\$1,155.30
TOTAL CURRENT CHARGES	\$84,492.30
BALANCE FORWARD	\$1,004,549.63
TOTAL BALANCE DUE	\$1,089,041.93

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	0.30	\$255.00
BL	Bankruptcy Litigation [L430]	18.80	\$15,380.00
BO	Business Operations	0.30	\$255.00
CA	Case Administration [B110]	1.50	\$1,275.00
CO	Claims Admin/Objections[B310]	25.40	\$20,582.00
LN	Litigation (Non-Bankruptcy)	4.40	\$3,740.00
PD	Plan & Disclosure Stmt. [B320]	58.20	\$41,510.00
SL	Stay Litigation [B140]	0.40	\$340.00
		109.30	\$83,337.00

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DAZ	Ziehl, Dean A.	Partner	1095.00	8.80	\$9,636.00
HDH	Hochman, Harry D.	Counsel	850.00	19.60	\$16,660.00
LAF	Forrester, Leslie A.	Other	395.00	0.80	\$316.00
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	15.00	\$3,750.00
TCF	Flanagan, Tavi C.	Counsel	650.00	11.80	\$7,670.00
WNL	Lobel, William N.	Partner	850.00	53.30	\$45,305.00
				109.30	\$83,337.00

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$127.50
Federal Express [E108]	\$267.78
Lexis/Nexis- Legal Research [E	\$196.91

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Outside Services	\$2.52
Pacer - Court Research	\$245.70
Postage [E108]	\$15.39
Reproduction/ Scan Copy	\$299.50
	<hr/> <hr/> \$1,155.30

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
08/22/2018	WNL	AA	Review correspondence re: amended section 544 order.	0.10	850.00	\$85.00
08/22/2018	WNL	AA	Review amended section 544 order.	0.10	850.00	\$85.00
08/22/2018	WNL	AA	Review final form of judgment re: section 547 and 544 claims.	0.10	850.00	\$85.00
				0.30		\$255.00
Bankruptcy Litigation [L430]						
08/01/2018	NPL	BL	Prepare compendium of exhibits regarding motion to dismiss first amended complaint regarding Steward v. Bral.	0.30	250.00	\$75.00
08/01/2018	NPL	BL	Prepare declaration of L. Gauthier in support of motion to dismiss first amended complaint of Steward v. Bral.	0.60	250.00	\$150.00
08/07/2018	NPL	BL	Draft email to A. Friedman regarding orders lifting stay on adversary matters; review and reply to email from A. Friedman regarding same.	0.10	250.00	\$25.00
08/20/2018	HDH	BL	Conference with Dean A. Ziehl re subpoena	0.30	850.00	\$255.00
08/20/2018	HDH	BL	Research re protective order	2.20	850.00	\$1,870.00
08/20/2018	HDH	BL	Begin drafting letter re subpoena	1.30	850.00	\$1,105.00
08/20/2018	HDH	BL	Review transcript	0.30	850.00	\$255.00
08/21/2018	HDH	BL	Research and drafting of pleading re subpoena / protective order	0.90	850.00	\$765.00
08/21/2018	HDH	BL	Conference with Dean A. Ziehl re meet and confer letter	0.20	850.00	\$170.00
08/23/2018	HDH	BL	Research and drafting of motion for protective order	1.50	850.00	\$1,275.00
08/23/2018	HDH	BL	Continue research and drafting of emergency motion	4.20	850.00	\$3,570.00
08/24/2018	HDH	BL	Revise motion for protective order	2.80	850.00	\$2,380.00
08/24/2018	HDH	BL	Correspondence and telephone conferences with William N. Lobel and Dean A. Ziehl re motion and revise same	0.70	850.00	\$595.00
08/24/2018	HDH	BL	Draft objection to production of documents	1.00	850.00	\$850.00
08/24/2018	HDH	BL	Coordinate filing of motion and notice thereof	0.60	850.00	\$510.00
08/24/2018	HDH	BL	Telephone conferences with William N. Lobel and Dean A. Ziehl re motion and hearing	0.50	850.00	\$425.00
08/24/2018	HDH	BL	Telephonic hearing re emergency motion	0.60	850.00	\$510.00
08/24/2018	HDH	BL	Follow up Telephone conference with Dean A. Ziehl re hearing and order	0.30	850.00	\$255.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/24/2018	HDH	BL	Draft order on motion	0.40	850.00	\$340.00
				18.80		\$15,380.00

Business Operations

08/15/2018	WNL	BO	Review additional correspondence re: distributions from Westcliff or Mission.	0.20	850.00	\$170.00
08/27/2018	WNL	BO	Review stipulation to modify stay to allow distributions from WestCliff.	0.10	850.00	\$85.00
				0.30		\$255.00

Case Administration [B110]

08/06/2018	WNL	CA	Review summary of pending deadlines.	0.10	850.00	\$85.00
08/07/2018	WNL	CA	Review revised critical date summary.	0.10	850.00	\$85.00
08/07/2018	WNL	CA	Review additional correspondence re: orders from hearing.	0.20	850.00	\$170.00
08/08/2018	WNL	CA	Review and respond to correspondence re: administrative issues.	0.40	850.00	\$340.00
08/13/2018	WNL	CA	Review correspondence case issues and alternatives.	0.30	850.00	\$255.00
08/14/2018	WNL	CA	Review monthly operating report for July, 2018.	0.10	850.00	\$85.00
08/16/2018	WNL	CA	Review updated summary of critical dates.	0.10	850.00	\$85.00
08/31/2018	WNL	CA	Review orders setting hearings on various matters and related correspondence.	0.20	850.00	\$170.00
				1.50		\$1,275.00

Claims Admin/Objections[B310]

08/01/2018	TCF	CO	Review and analysis of BCRS claim no. 23 and objection thereto; correspondence with A. Friedman regarding same.	0.20	650.00	\$130.00
08/01/2018	WNL	CO	Review correspondence re: estimation of claims for voting purposes.	0.20	850.00	\$170.00
08/01/2018	WNL	CO	Analyze issues concerning claims issues and treatment in plan.	0.70	850.00	\$595.00
08/01/2018	WNL	CO	Analyze strategy and course of action to pursue re: objections to claims.	0.80	850.00	\$680.00
08/02/2018	WNL	CO	Review correspondence re:amount of management fees paid to John Bral and related issues.	0.10	850.00	\$85.00
08/07/2018	WNL	CO	Consider strategy with respect to pending issues.	0.60	850.00	\$510.00
08/08/2018	TCF	CO	Review and analysis of claim issues and objections.	0.20	650.00	\$130.00
08/08/2018	WNL	CO	Review correspondence re: claims issues.	0.30	850.00	\$255.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/13/2018	WNL	CO	`Review prior pleadings and transcripts and formulate strategy and arguments re: objections to claims.	1.60	850.00	\$1,360.00
08/13/2018	WNL	CO	Review correspondence re: claims issues.	0.10	850.00	\$85.00
08/15/2018	WNL	CO	Review correspondence re: proof of claim filed by Orange County Tax Collector.	0.10	850.00	\$85.00
08/15/2018	WNL	CO	Review proof of claim filed by the Orange County Tax Collector.	0.10	850.00	\$85.00
08/15/2018	WNL	CO	Review correspondence re: claim of Orange County.	0.10	850.00	\$85.00
08/16/2018	LAF	CO	Research re: Halvorson appeal.	0.80	395.00	\$316.00
08/16/2018	NPL	CO	Review and reply to email from A. Friedman regarding research of Halvorson case.	0.10	250.00	\$25.00
08/16/2018	NPL	CO	Telephone call with T. Flanagan regarding Halvorson case.	0.20	250.00	\$50.00
08/16/2018	NPL	CO	Research Halvorson case and status of appeal.	0.60	250.00	\$150.00
08/16/2018	NPL	CO	Draft email to A. Friedman regarding research on Halvorson case.	0.20	250.00	\$50.00
08/16/2018	NPL	CO	Draft email to L. Forrester regarding researching Halvorson appeal.	0.10	250.00	\$25.00
08/16/2018	NPL	CO	Telephone call to L. Forrester regarding researching Halvorson appeal; draft email to L. Forrester regarding same.	0.20	250.00	\$50.00
08/16/2018	NPL	CO	Review and reply to email from L. Forrester regarding Halvorson appeal.	0.20	250.00	\$50.00
08/17/2018	DAZ	CO	Telephone call from W. Lobel re subpoena (.30); Review same (.20).	0.50	1095.00	\$547.50
08/17/2018	WNL	CO	Review correspondence re: enforcement of attorneys fees award	0.10	850.00	\$85.00
08/19/2018	DAZ	CO	Telephone conference with W. Lobel re Bral discovery and background re case and discovery issues.	0.50	1095.00	\$547.50
08/20/2018	DAZ	CO	Review subpoena, transcript of hearing and authorities (2.0); Office conferences with W. Lobel and H. Hochman re background and strategy re motion to quash (1.0).	3.00	1095.00	\$3,285.00
08/20/2018	NPL	CO	Office conference with W. Lobel regarding deposition subpoena of W. Lobel.	0.20	250.00	\$50.00
08/20/2018	NPL	CO	Draft email to T. Flanagan regarding deposition subpoena of W. Lobel; review email from A. Friedman regarding same.	0.10	250.00	\$25.00
08/21/2018	DAZ	CO	Office conference with W. Lobel re background facts and circumstances re subpoena (1.0); Review and revise letter to Lallas and conference with H.	1.80	1095.00	\$1,971.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Hochman re same (.30); Review authorities re privilege (.50).			
08/22/2018	HDH	CO	Research and drafting of motion for protective order	1.80	850.00	\$1,530.00
08/22/2018	WNL	CO	Review correspondence re: Orange County tax claim.	0.10	850.00	\$85.00
08/23/2018	DAZ	CO	Review draft motion for protective order and conference with H. Hochman re same.	0.50	1095.00	\$547.50
08/23/2018	NPL	CO	Attention to document production regarding subpoena of W. Lobel.	0.60	250.00	\$150.00
08/24/2018	DAZ	CO	Review and revise ex parte motion for protective order; Conference with W. Lobel and H. Hochman re same (.70); Prepare for and participate on telephonic hearing with Judge Clarkson (1.50); Review objection to production and correspondence (.30).	2.50	1095.00	\$2,737.50
08/24/2018	WNL	CO	Analyze issues and review revised Motion For Protective Order.	1.40	850.00	\$1,190.00
08/24/2018	TCF	CO	Communications with A. Friedman regarding claim objections.	0.10	650.00	\$65.00
08/24/2018	WNL	CO	Review correspondence and draft stipulations re: temporary allowance of claims.	0.20	850.00	\$170.00
08/24/2018	WNL	CO	Review correspondence re: basis for objection to claim 23.	0.10	850.00	\$85.00
08/24/2018	WNL	CO	rEVIEW CORRESPONDENCE RE: STIPULATOION CONCERNING OBJECTIONS TO CLAIMS 13 AND 17.	0.10	850.00	\$85.00
08/24/2018	NPL	CO	Review production request to W. Lobel regarding subpoena of W. Lobel; attention to same.	1.10	250.00	\$275.00
08/24/2018	NPL	CO	Review motion to quash subpoena of W. Lobel.	0.20	250.00	\$50.00
08/24/2018	NPL	CO	Prepare W. Lobel for emergency hearing on motion to quash.	0.20	250.00	\$50.00
08/24/2018	NPL	CO	Review declaration of M. Hurwitz regarding deposition of W. Lobel.	0.10	250.00	\$25.00
08/27/2018	WNL	CO	Review correspondence re: interest on claim of Orange County.	0.10	850.00	\$85.00
08/27/2018	WNL	CO	Analyze claims issues and alternative treatments in plan.	0.30	850.00	\$255.00
08/27/2018	WNL	CO	Review correspondence re: stipulations concerning claims 13 and 17.	0.10	850.00	\$85.00
08/27/2018	WNL	CO	Review additional correspondence re: stipulations concerning pending claims and drafts of stipulations.	0.20	850.00	\$170.00
08/27/2018	WNL	CO	Analyze issues and strategy concerning objections to, and treatment of, claims in plan.	0.50	850.00	\$425.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/27/2018	NPL	CO	Review entered order regarding Judge Clarkson's recusal.	0.10	250.00	\$25.00
08/27/2018	NPL	CO	Office conference with W. Lobel regarding Judge Clarkson's recusal.	0.10	250.00	\$25.00
08/27/2018	NPL	CO	Review and reply to email from L. Gauthier regarding transcript on ex parte motion to quash subpoena.	0.10	250.00	\$25.00
08/27/2018	NPL	CO	Review transcript order form regarding emergency hearing to quash subpoena; draft email to L. Gauthier regarding same.	0.10	250.00	\$25.00
08/28/2018	WNL	CO	Review further correspondence re: stipulation considering claims 13 and 17.	0.10	850.00	\$85.00
08/28/2018	WNL	CO	Review correspondence re: stipulations concerning claims 13 and 17.	0.10	850.00	\$85.00
08/29/2018	WNL	CO	Review revised stipulations and related correspondence re: claims 13 and 17.	0.20	850.00	\$170.00
08/29/2018	WNL	CO	Review additional correspondence re: claims 13 and 17.	0.10	850.00	\$85.00
08/30/2018	WNL	CO	Review additional correspondence re: claims 13 and 17.	0.20	850.00	\$170.00
08/30/2018	WNL	CO	Review correspondence re: revisions to stipulations re: claims and future distributions.	0.10	850.00	\$85.00
08/30/2018	WNL	CO	Review additional correspondence re: claims 13 and 17.	0.10	850.00	\$85.00
08/31/2018	WNL	CO	Review revised stipulation and related correspondence re: Westcliff distributions being paid to Cannae Financial.	0.10	850.00	\$85.00
08/31/2018	WNL	CO	Review and execute stipulation re: claims 13 and 17.	0.10	850.00	\$85.00
				<u>25.40</u>		<u>\$20,582.00</u>

Litigation (Non-Bankruptcy)

08/06/2018	WNL	LN	Analyze issues and develop strategy re: pending mediation.	0.70	850.00	\$595.00
08/07/2018	WNL	LN	Review correspondence re:mediation brief.	0.10	850.00	\$85.00
08/07/2018	WNL	LN	review correspondence and analyze issues concerning pending arbitrations.	0.80	850.00	\$680.00
08/08/2018	WNL	LN	Review correspondence re: pending arbitrations.	0.20	850.00	\$170.00
08/09/2018	WNL	LN	Review correspondence re: pending arbitration.	0.10	850.00	\$85.00
08/09/2018	WNL	LN	Review correspondence and analyze issues action taken by Beitler parties.	0.70	850.00	\$595.00
08/09/2018	WNL	LN	Consider strategies and courses of action available re: arbitrations.	0.80	850.00	\$680.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/13/2018	WNL	LN	Analyze alternatives available relevant to state court litigation and arbitration.	0.90	850.00	\$765.00
08/27/2018	WNL	LN	Review and respond to correspondence re: arbitration in WestCliff.	0.10	850.00	\$85.00
			4.40		\$3,740.00	

Plan & Disclosure Stmt. [B320]

08/01/2018	WNL	PD	Telephone call with A. Friedman re: stipulation to estimate claims for votig purposes and related issues.	0.20	850.00	\$170.00
08/01/2018	WNL	PD	Review and execute Notice of Filing Dissemination Versions off Second Amended Plan and Disclosurestatement.	0.10	850.00	\$85.00
08/01/2018	WNL	PD	Analyze issues and potential objections to confirmation.	0.80	850.00	\$680.00
08/01/2018	TCF	PD	Draft and revise plan solicitation materials, plan and disclosure statement, notice, ballots and attend related matters.	2.20	650.00	\$1,430.00
08/01/2018	TCF	PD	Review and analysis of plan confirmation issues, research regarding same.	0.80	650.00	\$520.00
08/01/2018	NPL	PD	Review and reply to email from L. Gauthier regarding notice of confirmation hearing; review same.	0.10	250.00	\$25.00
08/01/2018	NPL	PD	Review and reply to email from L. Gauthier regarding notice of dissemination of second amended disclosure statement and plan.	0.10	250.00	\$25.00
08/01/2018	NPL	PD	Finalize dissemination of second amended disclosure statement and plan; draft email to L. Gauthier regarding same.	0.30	250.00	\$75.00
08/02/2018	WNL	PD	Telephone conversation with A. Friedman re: claims estimation issues and pending mediation.	0.20	850.00	\$170.00
08/02/2018	WNL	PD	Review notice of confirmation hearing and notice of filking dissemination versions of plan and disclosure statement.	0.10	850.00	\$85.00
08/02/2018	TCF	PD	Attend to plan solicitation issues.	0.20	650.00	\$130.00
08/03/2018	WNL	PD	Review and analyze proposed settlement proposal to Barry Beitler.	0.30	850.00	\$255.00
08/03/2018	WNL	PD	Review comments re: settlement proposal.	0.10	850.00	\$85.00
08/03/2018	WNL	PD	Review additional correspondence re: settlement proposal.	0.10	850.00	\$85.00
08/03/2018	NPL	PD	Draft email to. E. Lohayza regarding notice of hearing on confirmation of plan; review and reply to email from E. Lohayza regarding same.	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/03/2018	NPL	PD	Finalize notice of hearing on confirmation of second amended plan of reorganization.	0.30	250.00	\$75.00
08/06/2018	WNL	PD	Review time line for plan confirmation.	0.10	850.00	\$85.00
08/06/2018	WNL	PD	Review and begin revision of letter to mediator.	0.60	850.00	\$510.00
08/07/2018	WNL	PD	Confer with A. Friedman re: settlement and mediation issues.	0.30	850.00	\$255.00
08/07/2018	WNL	PD	Review comments to letter to mediator.	0.10	850.00	\$85.00
08/07/2018	WNL	PD	Review correspondence re: pending mediation.	0.10	850.00	\$85.00
08/07/2018	WNL	PD	Review and respond to correspondence re: plan confirmation issues.	0.20	850.00	\$170.00
08/08/2018	WNL	PD	Review and revise revised mediation letter to mediator.	0.50	850.00	\$425.00
08/08/2018	WNL	PD	Review correspondence re: comments on draft mediation letter.	0.10	850.00	\$85.00
08/08/2018	WNL	PD	Review correspondence and analyze issues re: plan confirmation issues.	0.90	850.00	\$765.00
08/08/2018	WNL	PD	Review correspondence re: plan issues.	0.20	850.00	\$170.00
08/08/2018	TCF	PD	Review and analysis of confirmation dates and deadlines; correspondence with team regarding same.	0.20	650.00	\$130.00
08/08/2018	TCF	PD	Review and analysis of mediation statement and issues.	0.40	650.00	\$260.00
08/08/2018	TCF	PD	Correspondence with team regarding mediation statement and issues.	0.10	650.00	\$65.00
08/09/2018	WNL	PD	Review correspondence and analyze issues re: ultimate liquidation of assets of the estate.	0.50	850.00	\$425.00
08/09/2018	WNL	PD	telephone call with a. Friedman re: mediation issues and revised letter to the mediator.	0.20	850.00	\$170.00
08/09/2018	WNL	PD	Review and analyze transcripts of various hearings being sent to the mediator.	0.70	850.00	\$595.00
08/09/2018	WNL	PD	Review final version of letter to mediator.	0.20	850.00	\$170.00
08/10/2018	WNL	PD	Telephone conversation with A. Friedman re: pending mediation and related confirmation and other plan issues.	0.30	850.00	\$255.00
08/10/2018	TCF	PD	Correspondence with team regarding mediation.	0.10	650.00	\$65.00
08/10/2018	NPL	PD	Attention to dates and deadlines associated with confirmation of plan of reorganization.	0.30	250.00	\$75.00
08/14/2018	NPL	PD	Attention to multiple dates and deadlines associated with mediation and plan confirmation.	0.30	250.00	\$75.00
08/14/2018	WNL	PD	Telephone call with A. Friedman re: strategy for upcoming mediation.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/14/2018	WNL	PD	Review correspondence re: distributions from Westcliff and Mission during the Chapter 11.	0.10	850.00	\$85.00
08/14/2018	WNL	PD	Review and revise draft of communication to G. Klausner re: need for independent counsel for Beitler at mediation.	0.30	850.00	\$255.00
08/14/2018	WNL	PD	Review correspondence re: distributions from West Cliff and Mission to John Bral.	0.10	850.00	\$85.00
08/14/2018	WNL	PD	Review additional correspondence re: distributions to John Bral.	0.10	850.00	\$85.00
08/14/2018	TCF	PD	Review and analysis of plan confirmation issues.	0.50	650.00	\$325.00
08/15/2018	WNL	PD	Review correspondence re: comments to communication to Gary Klausner re: attendance at mediation.	0.10	850.00	\$85.00
08/15/2018	WNL	PD	Review additional correspondence re: distributions from West Cliff and Mission.	0.10	850.00	\$85.00
08/15/2018	WNL	PD	Telephone call with A. Friedman re: information requested for mediation and related issues.	0.20	850.00	\$170.00
08/15/2018	WNL	PD	Review correspondence re: information requested by Gary Klausner.	0.10	850.00	\$85.00
08/15/2018	WNL	PD	Review additional correspondence re: mediation issues.	0.10	850.00	\$85.00
08/15/2018	WNL	PD	Confer with A. Friedman re: mediation issues.	0.40	850.00	\$340.00
08/15/2018	WNL	PD	Review correspondence re: mediation issues.	0.10	850.00	\$85.00
08/15/2018	WNL	PD	Telephone call with A. Friedman re: mediation issues.	0.10	850.00	\$85.00
08/15/2018	WNL	PD	Review correspondence re: correspondence to G. Klausner.	0.10	850.00	\$85.00
08/15/2018	WNL	PD	Review and analyze West Cliff and Mission Operating Agreements re: payment of leasing commissions and management fees.	0.60	850.00	\$510.00
08/15/2018	WNL	PD	Telephone conferences with A. Friedman re: West Cliff, Mission and mediation issues.	0.40	850.00	\$340.00
08/15/2018	WNL	PD	Review and comment on correspondence re: attendance of independent counsel at the mediation.	0.10	850.00	\$85.00
08/15/2018	WNL	PD	Review correspondence re: interest on claim of Orange County Tax Collector.	0.10	850.00	\$85.00
08/15/2018	TCF	PD	Review and analysis of treatment of tax claims under plan; correspondence with respect thereto.	0.20	650.00	\$130.00
08/15/2018	TCF	PD	Review and analysis of plan and confirmation issues.	0.20	650.00	\$130.00
08/15/2018	NPL	PD	Draft email to A. Friedman regarding Beitler mediation.	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/16/2018	WNL	PD	Attendance at mediation with Barry Beitler and his counsel.	8.90	850.00	\$7,565.00
08/16/2018	WNL	PD	Review and analyze prior pleading in preparation for mediation.	3.70	850.00	\$3,145.00
08/16/2018	TCF	PD	Attend to mediation related issues, communications with team regarding same.	0.50	650.00	\$325.00
08/17/2018	WNL	PD	Review draft mediation report: telephone call with A. Friedman re:same.	0.10	850.00	\$85.00
08/17/2018	WNL	PD	Review additional correspondence re: mediation and attorney's fee issues.	0.10	850.00	\$85.00
08/17/2018	WNL	PD	Review correspondence re: use of enforcement rights to collect sanctions.	0.10	850.00	\$85.00
08/17/2018	WNL	PD	Review summary of results of mediation.	0.10	850.00	\$85.00
08/17/2018	WNL	PD	Review correspondence re: distributions from Westcliff or Mission.	0.10	850.00	\$85.00
08/17/2018	WNL	PD	Telephone conversation with A. Friedman re: subpoena of W. Lobel.	0.30	850.00	\$255.00
08/17/2018	WNL	PD	Review expense reports re: expenditures for dinner with Judge Clarkson.	0.20	850.00	\$170.00
08/17/2018	WNL	PD	Review additional correspondence re: distributions from Westcliff and/ or Mission.	0.20	850.00	\$170.00
08/17/2018	WNL	PD	Review summary of distributions to John Bral from Westcliff and Mission.	0.10	850.00	\$85.00
08/20/2018	WNL	PD	Telephone call with John Bral re: results of mediation.	0.20	850.00	\$170.00
08/20/2018	WNL	PD	Telephone call with m. Weilalnd re: expense reports.	0.10	850.00	\$85.00
08/20/2018	WNL	PD	Telephone call with A. Friedman and R. Hodges re: response to subpoena for W. Lobel deposition.	0.30	850.00	\$255.00
08/20/2018	WNL	PD	Review letter re: motion for protective order.	0.10	850.00	\$85.00
08/20/2018	WNL	PD	Review and analyze memorandum re: similar protective order issues in another case.	0.40	850.00	\$340.00
08/20/2018	WNL	PD	Review correspondence re: plan confirmation issues.	0.10	850.00	\$85.00
08/20/2018	WNL	PD	Review correspondence re: deposition of Michelle Easton.	0.10	850.00	\$85.00
08/20/2018	NPL	PD	Review debtor docket; prepare counsel for confirmation hearing.	4.10	250.00	\$1,025.00
08/21/2018	WNL	PD	Review correspondence re: issues concerning subpoenas issued against W. Lobel and A. Friedman.	0.10	850.00	\$85.00
08/21/2018	WNL	PD	Telephone calls with D. Ziehl re: response to Subpoena issued against W. Lobel.	0.30	850.00	\$255.00
08/21/2018	WNL	PD	Review additional correspondence re: subpoena issues.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/21/2018	WNL	PD	Review correspondence re: subpoena issues.	0.20	850.00	\$170.00
08/21/2018	WNL	PD	Confer with A. Friedman re: case strategy and related issues.	0.50	850.00	\$425.00
08/21/2018	WNL	PD	Review and analyze correspondence re: classification of judgment claim in class 5.	0.10	850.00	\$85.00
08/22/2018	WNL	PD	Review and analyze stipulation and related correspondence re: issues concerning section 544 order.	0.20	850.00	\$170.00
08/22/2018	TCF	PD	Review and analysis of plan issues.	0.40	650.00	\$260.00
08/22/2018	TCF	PD	Review and analysis of claim objections.	0.30	650.00	\$195.00
08/23/2018	WNL	PD	Telephone call with A. Friedman re: classification issues.	0.30	850.00	\$255.00
08/23/2018	WNL	PD	Review correspondence re: lien to be given in plan for attorneys fees.	0.10	850.00	\$85.00
08/23/2018	TCF	PD	Communication with team regarding plan confirmation issues.	0.10	650.00	\$65.00
08/23/2018	TCF	PD	Attend to plan confirmation issues and outstanding matters to be addressed.	1.80	650.00	\$1,170.00
08/23/2018	NPL	PD	Review and reply to email from T. Flanagan regarding plan confirmation.	0.10	250.00	\$25.00
08/24/2018	WNL	PD	Confer with A. Friedman re: issuea concerning subpoena of W. Lobel	0.30	850.00	\$255.00
08/24/2018	WNL	PD	Telephone conferences with A. Friedman re Motion For Protective Order.	0.50	850.00	\$425.00
08/24/2018	WNL	PD	Review and respond to correspondence re: Court Ruling on Motion for Protective Order.	0.10	850.00	\$85.00
08/24/2018	WNL	PD	Review correspondnce re: pending deposition of M. Easton.	0.10	850.00	\$85.00
08/24/2018	WNL	PD	Review draft of Order Granting Motion For Protective Order.	0.10	850.00	\$85.00
08/24/2018	WNL	PD	Review pleadings and declaration of T. Lallas re: request for continuance of hearing on Motion For Protective Order.	0.20	850.00	\$170.00
08/24/2018	WNL	PD	Telephone calls with Dean Ziehl re> Motion For Protective Order.	0.40	850.00	\$340.00
08/24/2018	WNL	PD	Telephone conversation with H. Hochman re: Motion For Protective Order.	0.20	850.00	\$170.00
08/24/2018	WNL	PD	Review correspondence re: pending deposition of M. Easton.	0.10	850.00	\$85.00
08/24/2018	TCF	PD	Review and analysis of plan confirmation preparation and brief in support of confirmation.	0.20	650.00	\$130.00
08/24/2018	TCF	PD	Communications with L. Gauthier regarding plan	0.10	650.00	\$65.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			confirmation preparation and brief in support of confirmation.			
08/24/2018	NPL	PD	Review adversary dockets for four adversaries; prepare counsel for confirmation hearing regarding same.	3.60	250.00	\$900.00
08/24/2018	NPL	PD	Review and reply to email from T. Flanagan regarding plan confirmation brief.	0.10	250.00	\$25.00
08/25/2018	WNL	PD	Telephone call with A. Friedman re: Motion to Strike and effect of plan confirmation.	0.30	850.00	\$255.00
08/25/2018	WNL	PD	Review and analyze correspondence re: strategy concerning 547 claims.	0.20	850.00	\$170.00
08/25/2018	WNL	PD	Review and respond to correspondence re: need for independent counsel for John Bral re: lien for attorneys fees in plan.	0.10	850.00	\$85.00
08/26/2018	WNL	PD	Analyze ramifications of Judge Clarkson's recusal and available courses of action.	0.40	850.00	\$340.00
08/27/2018	WNL	PD	Review Order Approving Motion To Quash Subpoena.	0.10	850.00	\$85.00
08/27/2018	WNL	PD	Review correspondence re: transcript of hearing on Motion To Quash Subpoena.	0.10	850.00	\$85.00
08/27/2018	WNL	PD	Analyze plan confirmation issues considering current state of the chapter 11.	0.60	850.00	\$510.00
08/27/2018	WNL	PD	Telephone call with A. Friedman re: plan confirmation issues.	0.30	850.00	\$255.00
08/27/2018	WNL	PD	Second telephone call with A. Friedman re: plan confirmation issues.	0.30	850.00	\$255.00
08/27/2018	WNL	PD	Consider and analyze plan confirmation issues.	0.70	850.00	\$595.00
08/27/2018	WNL	PD	Review and respond to correspondence re: mediation.	0.10	850.00	\$85.00
08/27/2018	WNL	PD	Review correspondence re: non-appearance of M. Easton at her deposition.	0.10	850.00	\$85.00
08/27/2018	WNL	PD	Telephone call with A. Friedman re: plan confirmation issues.	0.20	850.00	\$170.00
08/27/2018	WNL	PD	Telephone call with A. Friedman re: M. Easton issues.	0.20	850.00	\$170.00
08/27/2018	WNL	PD	Review additional correspondence re: deposition of M. Easton.	0.10	850.00	\$85.00
08/27/2018	TCF	PD	Telephone conference with A. Friedman regarding case and confirmation related issues; go-forward strategy.	0.40	650.00	\$260.00
08/27/2018	TCF	PD	Review and analysis of plan confirmation issues.	1.20	650.00	\$780.00
08/28/2018	WNL	PD	Review vote of M. Easton for the plan and related correspondence.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/28/2018	WNL	PD	Review correspondence re: potential violations of bankruptcy law re: plan voting.	0.10	850.00	\$85.00
08/28/2018	WNL	PD	Telephone call with A. Friedman re: plan confirmation and voting issues.	0.40	850.00	\$340.00
08/29/2018	WNL	PD	Telephone call with A. Friedman re: plan confirmation issues.	0.20	850.00	\$170.00
08/29/2018	WNL	PD	Review correspondence re: Beitler's Objectioon to Plan Confirmation.	0.10	850.00	\$85.00
08/29/2018	WNL	PD	Review and analyze Beitler perties objection to plan confirmation.	0.50	850.00	\$425.00
08/29/2018	WNL	PD	Review and analyze Beitler Motion to estimate Claims for Votinh Purposes.	0.50	850.00	\$425.00
08/29/2018	WNL	PD	Review declaration of B. Beitler re: Motion fo Order Temporarily Estimating Claims.	0.10	850.00	\$85.00
08/30/2018	WNL	PD	Review correspondence re: Plan Support Agreement.	0.20	850.00	\$170.00
08/30/2018	WNL	PD	Review and analyze transcript of hearing of August 24 hearing	1.20	850.00	\$1,020.00
08/31/2018	WNL	PD	Conference call with A. Friedman, T. Flanagan and A. Meislik re: responses to objections to plan confirmation.	0.60	850.00	\$510.00
08/31/2018	WNL	PD	Telephone call with A. Friedman re:issues to be addressed and strategy re: plan confirmation.	0.40	850.00	\$340.00
08/31/2018	TCF	PD	Review and analysis of objections to plan filed by Beitler Parties.	0.50	650.00	\$325.00
08/31/2018	TCF	PD	Telephone conference with team regarding plan objections and case strategy.	0.90	650.00	\$585.00
				58.20		\$41,510.00

Stay Litigation [B140]

08/07/2018	WNL	SL	Review correspondence re: stay issues.	0.20	850.00	\$170.00
08/27/2018	WNL	SL	Review Stipulation and related correspondence re: Cannae-Relief From Stay Stipulation.	0.20	850.00	\$170.00
				0.40		\$340.00

TOTAL SERVICES FOR THIS MATTER:

\$83,337.00

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Expenses

08/01/2018	PO	Postage [E108] Courtesy Copies to Chambers of Second Amended Plan and Disclosure Stmt. WNL	15.39
08/02/2018	OS	JAMS, Inv. 12200531162, WNL	2.52
08/08/2018	RE2	SCAN/COPY (17 @0.10 PER PG)	1.70
08/16/2018	LN	10601.00001 Lexis Charges for 08-16-18	13.04
08/20/2018	FE	Federal Express [E108] 773020423351	99.94
08/20/2018	LN	10601.00001 Lexis Charges for 08-20-18	183.87
08/20/2018	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
08/20/2018	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
08/20/2018	RE2	SCAN/COPY (118 @0.10 PER PG)	11.80
08/20/2018	RE2	SCAN/COPY (21 @0.10 PER PG)	2.10
08/20/2018	RE2	SCAN/COPY (25 @0.10 PER PG)	2.50
08/20/2018	RE2	SCAN/COPY (48 @0.10 PER PG)	4.80
08/20/2018	RE2	SCAN/COPY (46 @0.10 PER PG)	4.60
08/20/2018	RE2	SCAN/COPY (58 @0.10 PER PG)	5.80
08/20/2018	RE2	SCAN/COPY (52 @0.10 PER PG)	5.20
08/20/2018	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
08/20/2018	RE2	SCAN/COPY (39 @0.10 PER PG)	3.90
08/20/2018	RE2	SCAN/COPY (378 @0.10 PER PG)	37.80
08/20/2018	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
08/20/2018	RE2	SCAN/COPY (84 @0.10 PER PG)	8.40

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08/20/2018	RE2	SCAN/COPY (48 @0.10 PER PG)	4.80
08/20/2018	RE2	SCAN/COPY (118 @0.10 PER PG)	11.80
08/20/2018	RE2	SCAN/COPY (27 @0.10 PER PG)	2.70
08/20/2018	RE2	SCAN/COPY (65 @0.10 PER PG)	6.50
08/20/2018	RE2	SCAN/COPY (19 @0.10 PER PG)	1.90
08/20/2018	RE2	SCAN/COPY (42 @0.10 PER PG)	4.20
08/20/2018	RE2	SCAN/COPY (84 @0.10 PER PG)	8.40
08/20/2018	RE2	SCAN/COPY (26 @0.10 PER PG)	2.60
08/20/2018	RE2	SCAN/COPY (64 @0.10 PER PG)	6.40
08/24/2018	FE	10601.00001 FedEx Charges for 08-24-18	9.42
08/24/2018	FE	Federal Express [E108] 773062656539	158.42
08/24/2018	RE2	SCAN/COPY (121 @0.10 PER PG)	12.10
08/24/2018	RE2	SCAN/COPY (366 @0.10 PER PG)	36.60
08/24/2018	RE2	SCAN/COPY (56 @0.10 PER PG)	5.60
08/24/2018	RE2	SCAN/COPY (72 @0.10 PER PG)	7.20
08/24/2018	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
08/24/2018	RE2	SCAN/COPY (29 @0.10 PER PG)	2.90
08/24/2018	RE2	SCAN/COPY (59 @0.10 PER PG)	5.90
08/24/2018	RE2	SCAN/COPY (47 @0.10 PER PG)	4.70
08/24/2018	RE2	SCAN/COPY (23 @0.10 PER PG)	2.30
08/24/2018	RE2	SCAN/COPY (44 @0.10 PER PG)	4.40
08/24/2018	RE2	SCAN/COPY (127 @0.10 PER PG)	12.70

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08/24/2018	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
08/24/2018	RE2	SCAN/COPY (61 @0.10 PER PG)	6.10
08/24/2018	RE2	SCAN/COPY (58 @0.10 PER PG)	5.80
08/24/2018	RE2	SCAN/COPY (90 @0.10 PER PG)	9.00
08/24/2018	RE2	SCAN/COPY (80 @0.10 PER PG)	8.00
08/24/2018	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
08/27/2018	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
08/28/2018	CC	Conference Call [E105] CourtCall for 8/1/2018 - 8/31/2018, DAZ	42.50
08/28/2018	CC	Conference Call [E105] CourtCall for 8/1/2018 - 8/31/2018, WNL	42.50
08/28/2018	CC	Conference Call [E105] CourtCall for 8/1/2018 - 8/31/2018, HDH	42.50
08/30/2018	RE2	SCAN/COPY (25 @0.10 PER PG)	2.50
08/30/2018	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
08/30/2018	RE2	SCAN/COPY (104 @0.10 PER PG)	10.40
08/30/2018	RE2	SCAN/COPY (18 @0.10 PER PG)	1.80
08/30/2018	RE2	SCAN/COPY (77 @0.10 PER PG)	7.70
08/31/2018	PAC	Pacer - Court Research	245.70

Total Expenses for this Matter **\$1,155.30**

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REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For current services rendered through 08/31/2018

Total Fees	\$83,337.00
Chargeable costs and disbursements	\$1,155.30
Total Due on Current Invoice.....	\$84,492.30

Outstanding Balance from prior Invoices as of 08/31/2018 **(May not reflect recent payments)**

Invoice Number	Invoice Date	Fees Billed	Expenses Billed	Balance Due
118521	01/31/2018	\$64,977.50	\$1.40	\$64,978.90
118768	02/28/2018	\$89,105.00	\$6,717.72	\$95,822.72
119267	03/31/2018	\$170,795.00	\$818.42	\$171,613.42
119338	04/30/2018	\$241,285.00	\$12,901.06	\$254,186.06
119732	06/13/2018	\$165,330.00	\$2,241.54	\$167,571.54
119915	06/30/2018	\$127,527.50	\$476.66	\$128,004.16
120454	07/31/2018	\$120,280.00	\$2,092.83	\$122,372.83
Total Amount Due on Current and Prior Invoices				\$1,089,041.93

Pachulski Stang Ziehl & Jones LLP

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

November 30, 2018
Invoice 120968
Client 10601
Matter 00001
WNL

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 11/30/2018

FEES	\$201,480.00
EXPENSES	\$2,218.98
TOTAL CURRENT CHARGES	\$203,698.98
BALANCE FORWARD	\$1,089,041.93
TOTAL BALANCE DUE	\$1,292,740.91

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	0.40	\$340.00
BL	Bankruptcy Litigation [L430]	3.40	\$1,810.00
BO	Business Operations	1.00	\$850.00
CA	Case Administration [B110]	13.70	\$10,915.00
CO	Claims Admin/Objections[B310]	4.50	\$3,125.00
FN	Financing [B230]	0.10	\$85.00
LN	Litigation (Non-Bankruptcy)	8.20	\$5,350.00
PD	Plan & Disclosure Stmt. [B320]	241.20	\$160,630.00
SL	Stay Litigation [B140]	28.30	\$18,375.00
		300.80	\$201,480.00

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	27.20	\$6,800.00
SAOS	O'Keefe, Sean A	Counsel	750.00	19.00	\$14,250.00
TCF	Flanagan, Tavi C.	Counsel	650.00	179.90	\$116,935.00
WNL	Lobel, William N.	Partner	850.00	74.70	\$63,495.00
				300.80	\$201,480.00

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Attorney Service [E107]	\$244.09
Conference Call [E105]	\$12.62
Federal Express [E108]	\$115.85

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Filing Fee [E112]	\$17.25
Lexis/Nexis- Legal Research [E	\$1,113.14
Outside Services	\$120.00
Pacer - Court Research	\$121.80
Postage [E108]	\$48.27
Reproduction/ Scan Copy	\$248.90
Overtime	\$146.42
Travel Expense [E110]	\$15.25
Transcript [E116]	\$15.39
	<hr/> <hr/> \$2,218.98

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
09/05/2018	WNL	AA	Review correspondence re: pending actions to invalidate liens.	0.10	850.00	\$85.00
09/10/2018	WNL	AA	Review and analyze issues and alternatives re: avoidance of liens.	0.30	850.00	\$255.00
				0.40	\$340.00	
Bankruptcy Litigation [L430]						
09/07/2018	WNL	BL	Review , analyze and comment on proposed insert into Status Report.	0.20	850.00	\$170.00
09/11/2018	WNL	BL	Review and analyze revised Status Report.	0.30	850.00	\$255.00
09/11/2018	WNL	BL	Review correspondence re: pleadings to be filed today.	0.10	850.00	\$85.00
09/11/2018	WNL	BL	Review additional correspondence re: various pleadings to be filed.	0.20	850.00	\$170.00
09/11/2018	WNL	BL	Review and revise initial draft of Status Report.	0.20	850.00	\$170.00
09/11/2018	WNL	BL	Review additional correspondence re: changes to declarations.	0.20	850.00	\$170.00
09/12/2018	WNL	BL	Review correspondence re: Steward non-dischargeability action and response thereto.	0.20	850.00	\$170.00
09/13/2018	WNL	BL	Review final versions of status reports in pending non-dischargeability lawsuits.	0.10	850.00	\$85.00
09/13/2018	NPL	BL	Review and reply to email from L. Gauthier regarding Beitler parties joint status reports.	0.20	250.00	\$50.00
09/13/2018	NPL	BL	Attention to preparation of defendant's portion of joint status reports for the Beitler parties adversary proceedings.	1.30	250.00	\$325.00
09/13/2018	NPL	BL	Review and reply to email from A. Friedman regarding joint status reports for the Beitler parties adversary proceedings.	0.10	250.00	\$25.00
09/13/2018	NPL	BL	Draft email to G. Klausner regarding joint status reports for the Beitler parties adversary proceedings.	0.10	250.00	\$25.00
09/13/2018	NPL	BL	Office conference with W. Lobel regarding joint status reports for the Beitler parties adversary proceedings.	0.10	250.00	\$25.00
09/14/2018	WNL	BL	Review draft Joint Status Reports and related correspondence.	0.10	850.00	\$85.00
				3.40	\$1,810.00	

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Business Operations						
09/14/2018	WNL	BO	Review Stipulation with Cannae Financial re: distributions from Westcliff.	0.10	850.00	\$85.00
09/17/2018	WNL	BO	Review Motion to Approve Stipulation to Allow Distributions from Westcliff.	0.10	850.00	\$85.00
09/26/2018	WNL	BO	Review correspondence re: distributions from Westcliff and Javier	0.10	850.00	\$85.00
09/26/2018	WNL	BO	Review additional correspondence re: breakdown for distribution checks.	0.10	850.00	\$85.00
10/15/2018	WNL	BO	Review Monthly Operating Report for month ending September 30, 2018.	0.10	850.00	\$85.00
10/20/2018	WNL	BO	Review correspondence re: distribution to Cannae from Westcliff.	0.10	850.00	\$85.00
10/24/2018	WNL	BO	Review correspondence re: distributions from Westcliff.	0.10	850.00	\$85.00
10/24/2018	WNL	BO	Review correspondence re: distributions from Westcliff.	0.10	850.00	\$85.00
10/25/2018	WNL	BO	Review correspondence and schedule of distributions from Westcliff.	0.10	850.00	\$85.00
10/26/2018	WNL	BO	Review correspondence re: Westcliff distributions.	0.10	850.00	\$85.00
				1.00	\$850.00	

Case Administration [B110]

09/06/2018	WNL	CA	Telephone call with A. Friedman re: strategy and pending Status report.	0.20	850.00	\$170.00
09/07/2018	NPL	CA	Attention to dates and deadlines associated with outstanding matters.	0.20	250.00	\$50.00
09/10/2018	WNL	CA	Comment on insert to Status Report.	0.10	850.00	\$85.00
09/11/2018	WNL	CA	Review and revise draft addition to status report.	0.40	850.00	\$340.00
09/11/2018	WNL	CA	Review additional correspondence re: changes to draft status report.	0.20	850.00	\$170.00
09/11/2018	WNL	CA	Review correspondence re: changes to draft Status Report.	0.20	850.00	\$170.00
09/11/2018	WNL	CA	Review and comment on draft Status Report.	0.20	850.00	\$170.00
09/11/2018	SAO	CA	Review proposed insert to status conference report.	0.50	750.00	\$375.00
09/12/2018	WNL	CA	Telephone call with A. Friedman re: status report and related issues and strategy.	0.40	850.00	\$340.00
09/12/2018	WNL	CA	Review and comment on draft of status report.	0.80	850.00	\$680.00
09/12/2018	WNL	CA	Review correspondence re: filing status report as a unilateral report.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/12/2018	WNL	CA	Review changes to status report.	0.10	850.00	\$85.00
09/12/2018	WNL	CA	Review correspondence re: Joint Status Report.	0.10	850.00	\$85.00
09/12/2018	SAO	CA	Conference call with A. Friedman re questions about revised version of insert to status conference report.	0.20	750.00	\$150.00
09/13/2018	WNL	CA	Telephone call with A. Friedman re: Joint Status Report and related issues.	0.30	850.00	\$255.00
09/13/2018	WNL	CA	Review and execute final versions of all status reports being filed.	0.20	850.00	\$170.00
09/13/2018	WNL	CA	Review updated critical dates summary.	0.10	850.00	\$85.00
09/13/2018	WNL	CA	Review additional correspondence re: joint status reports.	0.10	850.00	\$85.00
09/13/2018	WNL	CA	Review correspondence re: status report issues.	0.10	850.00	\$85.00
09/13/2018	WNL	CA	Review additional correspondence re: comments to draft status report.	0.10	850.00	\$85.00
09/17/2018	WNL	CA	Review correspondence re: pending deadlines and hearings.	0.20	850.00	\$170.00
09/18/2018	WNL	CA	Review Monthly Operating report for August.	0.10	850.00	\$85.00
09/20/2018	WNL	CA	Prepare for status conference including review of prior pleadings.	1.80	850.00	\$1,530.00
09/20/2018	WNL	CA	Telephone call with A. Friedman re: arguments for pending status conference.	0.50	850.00	\$425.00
09/20/2018	WNL	CA	Review pleadings and prepare arguments for pending status conference.	1.60	850.00	\$1,360.00
09/20/2018	WNL	CA	Attendance at status conference and related matters.	2.80	850.00	\$2,380.00
09/21/2018	WNL	CA	Review revised summary of pending deadlines.	0.10	850.00	\$85.00
10/01/2018	NPL	CA	Review critical dates and deadlines memorandum; attention to same.	0.50	250.00	\$125.00
10/10/2018	WNL	CA	Review updated critical date memo.	0.10	850.00	\$85.00
11/01/2018	NPL	CA	Review and reply to email from L. Gauthier regarding critical date and deadline memorandum.	0.10	250.00	\$25.00
11/08/2018	NPL	CA	Attention to outstanding matters; dates and deadlines regarding same.	0.30	250.00	\$75.00
11/15/2018	WNL	CA	Review monthly operational report for October, 2018.	0.10	850.00	\$85.00
11/19/2018	WNL	CA	Review updated critical dates memo.	0.10	850.00	\$85.00
11/24/2018	WNL	CA	Review and revise prebill for October, 2018.	0.80	850.00	\$680.00
				13.70		\$10,915.00

Claims Admin/Objections[B310]

09/01/2018	WNL	CO	Telephone call with A. Friedman re: strategy in	0.10	850.00	\$85.00
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			dealing with Beitler's bad acts.			
09/05/2018	WNL	CO	Review correspondence re: claim 23.	0.10	850.00	\$85.00
09/05/2018	WNL	CO	Review correspondence re: withdrawal of claim #23 and related issues.	0.10	850.00	\$85.00
09/05/2018	TCF	CO	Review and analysis of Beitler party claim issues.	1.40	650.00	\$910.00
09/06/2018	NPL	CO	Draft email to A. Friedman regarding Bral pleadings.	0.10	250.00	\$25.00
09/12/2018	TCF	CO	Review and analysis of Steward motion to dismiss; correspondence regarding same.	0.20	650.00	\$130.00
09/21/2018	WNL	CO	Review correspondence re: closing argument on Motion to Strike Claims.	0.10	850.00	\$85.00
09/25/2018	WNL	CO	Review correspondence re: Joint Statement Re: Scheduling of Closing Arguments on Motion To Strike.	0.10	850.00	\$85.00
09/25/2018	WNL	CO	Review correspondence re: Closing Arguments on Motion To Strike Claims.	0.10	850.00	\$85.00
09/26/2018	WNL	CO	Review correspondence re: stipulation re: scheduling final arguments on Motion to Strike.	0.10	850.00	\$85.00
10/04/2018	WNL	CO	Review correspondence re: Reply Brief re: Motion to Strike Claims.	0.20	850.00	\$170.00
10/09/2018	WNL	CO	Review correspondence re: treatment of claim of Orange County.	0.10	850.00	\$85.00
10/09/2018	WNL	CO	Review correspondence re: interest on claim of County of Orange.	0.10	850.00	\$85.00
10/20/2018	WNL	CO	Review Declaration of Non-opposition to Motion for Order Approving Stipulation with Cannae Financial.	0.10	850.00	\$85.00
11/26/2018	TCF	CO	Review and analysis of claim issues.	0.80	650.00	\$520.00
11/26/2018	TCF	CO	Communications with A. Friedman regarding claim issues.	0.20	650.00	\$130.00
11/26/2018	TCF	CO	Review and analysis regarding claim issues.	0.60	650.00	\$390.00
				4.50		\$3,125.00

Financing [B230]

09/26/2018	WNL	FN	Review correspondence re: Ous request for financial information.	0.10	850.00	\$85.00
				0.10		\$85.00

Litigation (Non-Bankruptcy)

09/24/2018	WNL	LN	Review correspondence re: status report for Bral V. Westcliff matter.	0.10	850.00	\$85.00
09/24/2018	NPL	LN	Review and reply to email from L. Gauthier	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			regarding status report for Bral v. Westcliff.			
09/25/2018	NPL	LN	Finalize status report regarding Bral v. Westcliff arbitration; draft email to L. Gauthier regarding same.	0.30	250.00	\$75.00
10/02/2018	NPL	LN	Draft email to L. Gauthier regarding Bral v. Westcliff status report; draft email to B. Anavim regarding same.	0.20	250.00	\$50.00
10/04/2018	SAO	LN	Conference call with A. Friedman re status conference in LASC and case status.	0.20	750.00	\$150.00
10/10/2018	WNL	LN	Telephone call with John Mittelbach and confer with Nancy Lockwood re: status conference in state court litigation; review correspondence re: same.	0.20	850.00	\$170.00
10/10/2018	SAO	LN	Status conference in Los Angeles Superior in Bral v. Westcliff.	0.40	750.00	\$300.00
10/17/2018	NPL	LN	Review and reply to email from L. Gauthier regarding Bral v. Westcliff notice of continued status conference.	0.10	250.00	\$25.00
10/17/2018	NPL	LN	Finalize notice of continued status conference regarding Bral v. Westcliff.	0.30	250.00	\$75.00
10/22/2018	TCF	LN	Telephone conference with A. Friedman regarding motion regarding stay violation.	0.20	650.00	\$130.00
10/22/2018	TCF	LN	Review and analysis of issues regarding motion regarding stay violation.	0.20	650.00	\$130.00
10/26/2018	WNL	LN	Review correspondence re: status of dismissal of cross-complaint.	0.10	850.00	\$85.00
10/29/2018	WNL	LN	Review and analyze final version of Motion for Contempt.	0.60	850.00	\$510.00
11/05/2018	WNL	LN	Review correspondence regarding objection to notice of deposition of J. Bral.	0.10	850.00	\$85.00
11/19/2018	WNL	LN	Review, analyze and respond to correspondence regarding possible settlement of sanctions issue.	0.20	850.00	\$170.00
11/28/2018	WNL	LN	Review correspondence regarding withdrawal of cross-complaint.	0.10	850.00	\$85.00
11/28/2018	WNL	LN	Review, analyze and respond to correspondence regarding cross-complaint in Mission state court litigation.	0.30	850.00	\$255.00
11/28/2018	TCF	LN	Review and analysis of pending litigation and related issues.	4.20	650.00	\$2,730.00
11/28/2018	TCF	LN	Review and analysis of stay violation issues.	0.20	650.00	\$130.00
11/29/2018	WNL	LN	Review correspondence regarding withdrawal of cross complaint.	0.10	850.00	\$85.00
				<hr/> 8.20		<hr/> \$5,350.00

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				Hours	Rate	Amount
Plan & Disclosure Stmt. [B320]						
08/29/2018	WNL	PD	Review declaration of M. Hurwitz re: Motion To estimate Claims For Voting Purposes.	0.10	850.00	\$85.00
09/01/2018	WNL	PD	Telephone call with A. Friedman re: objections to plan confirmation and responses thereto.	0.30	850.00	\$255.00
09/04/2018	WNL	PD	Analyze issues and responses re: potential objections to plan confirmation.	0.70	850.00	\$595.00
09/04/2018	WNL	PD	Review correspondence re: plan confirmation issues.	0.20	850.00	\$170.00
09/04/2018	TCF	PD	Review and analysis of plan confirmation issues to be addressed.	0.50	650.00	\$325.00
09/04/2018	TCF	PD	Telephone conference with A. Friedman regarding plan confirmation issues to be addressed.	0.10	650.00	\$65.00
09/04/2018	TCF	PD	Telephone conference with L. Gauthier regarding voting and balloting issues.	0.10	650.00	\$65.00
09/04/2018	TCF	PD	Review and analysis of voting results on plan.	0.10	650.00	\$65.00
09/04/2018	TCF	PD	Correspondence with team regarding voting.	0.10	650.00	\$65.00
09/05/2018	TCF	PD	Correspondence with A. Friedman regarding plan and voting matters.	0.10	650.00	\$65.00
09/05/2018	TCF	PD	Draft and revisions to confirmation documents.	0.80	650.00	\$520.00
09/05/2018	TCF	PD	Correspondence with L. Gauthier regarding confirmation documents.	0.10	650.00	\$65.00
09/06/2018	TCF	PD	Research regarding confirmation issues.	4.20	650.00	\$2,730.00
09/06/2018	WNL	PD	Review correspondence and analyze issues concerning exclusivity and dissolution of LLC's.	0.20	850.00	\$170.00
09/06/2018	WNL	PD	Review and analyze various objections of the Beitler parties to confirmation of plan.	0.60	850.00	\$510.00
09/06/2018	TCF	PD	Review and analysis of plan objections, research.	1.80	650.00	\$1,170.00
09/06/2018	TCF	PD	Research and review and revise confirmation brief.	3.20	650.00	\$2,080.00
09/07/2018	WNL	PD	Review correspondence re: hearing on motion to estimate claims.	0.10	850.00	\$85.00
09/07/2018	WNL	PD	Review correspondence re: Motion To Designate Claims.	0.10	850.00	\$85.00
09/07/2018	WNL	PD	Confer with A. Friedman re: plan confirmation objections and related issues.	0.30	850.00	\$255.00
09/07/2018	WNL	PD	Review plan and confer with E. fromme re: attorney's lien.	0.60	850.00	\$510.00
09/07/2018	WNL	PD	Review correspondence re: Beitler request for estimation of claims for voting purposes.	0.10	850.00	\$85.00
09/07/2018	WNL	PD	Review correspondence and analyze the issue re: attorneys lien for fees in the plan..	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/07/2018	WNL	PD	Review correspondence re: various aspects of attorneys fee lien and independent representation of John Bral re: same.	0.20	850.00	\$170.00
09/07/2018	TCF	PD	Research and drafting of confirmation brief.	6.80	650.00	\$4,420.00
09/07/2018	TCF	PD	Draft and revise confirmation brief.	5.60	650.00	\$3,640.00
09/07/2018	TCF	PD	Various correspondence with team regarding confirmation issues, objections and brief.	0.20	650.00	\$130.00
09/08/2018	WNL	PD	Review draft of confirmation brief and related correspondence.	1.80	850.00	\$1,530.00
09/08/2018	TCF	PD	Various correspondence with A. Meislik regarding evidence / declaration in support of confirmation.	0.20	650.00	\$130.00
09/08/2018	TCF	PD	Correspondence with A. Friedman regarding confirmation issues.	0.10	650.00	\$65.00
09/08/2018	TCF	PD	Review and analysis of confirmation issues.	0.30	650.00	\$195.00
09/08/2018	SAO	PD	Review and comment on confirmation brief.	0.50	750.00	\$375.00
09/09/2018	WNL	PD	Review Adam Meislik's comments re: confirmation issues.	0.10	850.00	\$85.00
09/09/2018	WNL	PD	Review redlined confirmation brief.	0.40	850.00	\$340.00
09/09/2018	WNL	PD	Review transcript of exclusively hraeing and other pleadings and transcripts re: comments of Judge Clarkson and Beitler parties re: pending issues.	1.20	850.00	\$1,020.00
09/09/2018	WNL	PD	Review correspondence re: plan issues	0.20	850.00	\$170.00
09/09/2018	WNL	PD	Review correspondence and analyze issues raised by specific language in confirmation brief.	0.20	850.00	\$170.00
09/09/2018	TCF	PD	Research and drafting of confirmation brief.	3.20	650.00	\$2,080.00
09/09/2018	TCF	PD	Research and draft confirmation brief.	1.80	650.00	\$1,170.00
09/10/2018	WNL	PD	Conference call with A. Friedman, T. Flanagan and S. o'Keefe re changes to confirmation brief.	1.20	850.00	\$1,020.00
09/10/2018	WNL	PD	Review and comment on revised declaration of Adam Meislik.	0.30	850.00	\$255.00
09/10/2018	WNL	PD	Review and comment on initial draft of Declaration of Adam Meislik.	0.30	850.00	\$255.00
09/10/2018	WNL	PD	Review and revise draft of confirmation brief.	1.20	850.00	\$1,020.00
09/10/2018	WNL	PD	Review additional correspondence re: confirmation brief.	0.20	850.00	\$170.00
09/10/2018	WNL	PD	Review A. Friedman's comments to draft Confirmation Brief.	0.40	850.00	\$340.00
09/10/2018	WNL	PD	Review correspondence re: Adam Meislik's Declaration.	0.20	850.00	\$170.00
09/10/2018	WNL	PD	Review transcript of hearing on exclusivity and correspondence re: its use.	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/10/2018	WNL	PD	Review and revise latest version of the confirmation brief.	0.80	850.00	\$680.00
09/10/2018	WNL	PD	Review and comment on initial draft of declaration of Adam Meislik in support of confirmation.	0.20	850.00	\$170.00
09/10/2018	WNL	PD	Review and comment on initial draft of declaration of John Bral in support of confirmation.	0.20	850.00	\$170.00
09/10/2018	WNL	PD	Conference call re: confirmation issues and pleadings.	0.90	850.00	\$765.00
09/10/2018	TCF	PD	Correspondence A. Friedman regarding confirmation issues.	0.10	650.00	\$65.00
09/10/2018	TCF	PD	Research and drafting of confirmation brief and supporting documents.	5.60	650.00	\$3,640.00
09/10/2018	TCF	PD	Continued research and drafting of confirmation brief and supporting documents; evidence, declarations in support.	5.20	650.00	\$3,380.00
09/10/2018	TCF	PD	Conference call with team regarding confirmation preparation.	1.20	650.00	\$780.00
09/10/2018	NPL	PD	Review and reply to email from T. Flanagan regarding confirmation brief.	0.10	250.00	\$25.00
09/10/2018	NPL	PD	Telephone call with L. Gauthier regarding plan confirmation brief.	0.10	250.00	\$25.00
09/10/2018	NPL	PD	Review debtor docket for plan confirmation deadlines; telephone call to L. Gauthier regarding same.	0.10	250.00	\$25.00
09/10/2018	SAO	PD	Participate in conference call with all counsel re confirmation issues and revisions and additions to plan confirmation brief.	0.70	750.00	\$525.00
09/11/2018	WNL	PD	Review and revise draft confirmation brief.	2.60	850.00	\$2,210.00
09/11/2018	WNL	PD	Review and revise draft declaration of A. Meislik in support of confirmation brief.	0.90	850.00	\$765.00
09/11/2018	WNL	PD	Review revised declaration of J. Bral.	0.40	850.00	\$340.00
09/11/2018	WNL	PD	Review additional correspondence re: plan confirmation issues.	0.10	850.00	\$85.00
09/11/2018	WNL	PD	Telephone call with A. Friedman re: changes to pleadings and declarations being filed.	0.20	850.00	\$170.00
09/11/2018	WNL	PD	Review revised exhibit to Adam Meislik Declaration and related correspondence.	0.20	850.00	\$170.00
09/11/2018	WNL	PD	Review correspondence re: declaration of John Bral in support of confirmation of the plan.	0.10	850.00	\$85.00
09/11/2018	WNL	PD	Review declaration of Adam Meislik and attached exhibits in support of plan confirmation.	0.20	850.00	\$170.00
09/11/2018	WNL	PD	Review correspondence re: plan confirmation issues.	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/11/2018	WNL	PD	Review additional correspondence re: Adam Meislik Declaration in support of Plan Confirmation.	0.20	850.00	\$170.00
09/11/2018	WNL	PD	Review correspondence re: issues concerning the Sandpiper property.	0.20	850.00	\$170.00
09/11/2018	WNL	PD	Review correspondence re: declaration of John Bral in support of Plan Confirmation.	0.10	850.00	\$85.00
09/11/2018	WNL	PD	Review additional correspondence re: John Bral Declaration.	0.20	850.00	\$170.00
09/11/2018	WNL	PD	Review correspondence re: changes to Declaration of John Bral.	0.10	850.00	\$85.00
09/11/2018	WNL	PD	Review additional correspondence re: John Bral's declaration.	0.20	850.00	\$170.00
09/11/2018	WNL	PD	Review additional changes to Aam Meislik Declaration in support of Plan Confirmation.	0.20	850.00	\$170.00
09/11/2018	WNL	PD	Review correspondence re: Declaration of John Bral in support of Plan Confirmation.	0.20	850.00	\$170.00
09/11/2018	WNL	PD	Review latest draft of Confirmation Brief.	0.90	850.00	\$765.00
09/11/2018	TCF	PD	Drafting and revisions to confirmation documents, brief, declarations.	6.20	650.00	\$4,030.00
09/11/2018	TCF	PD	Finalize confirmation documents, brief, declarations, evidence and motion to exceed page limit.	3.60	650.00	\$2,340.00
09/11/2018	NPL	PD	Draft email to A. Friedman regarding appendix of unpublished opinions.	0.10	250.00	\$25.00
09/11/2018	NPL	PD	Prepare appendix of unpublished opinions regarding confirmation brief; forward same to A. Friedman for review.	0.60	250.00	\$150.00
09/11/2018	NPL	PD	Review and reply to email from L. Gauthier regarding confirmation brief.	0.10	250.00	\$25.00
09/11/2018	NPL	PD	Review and reply to email from T. Flanagan regarding confirmation brief and supporting pleadings.	0.10	250.00	\$25.00
09/11/2018	NPL	PD	Lexis research of unpublished opinions regarding confirmation brief.	0.40	250.00	\$100.00
09/11/2018	NPL	PD	Finalize declaration of A. Meislik regarding confirmation brief.	0.70	250.00	\$175.00
09/11/2018	NPL	PD	Finalize declaration of John Bral in support of confirmation brief.	0.80	250.00	\$200.00
09/11/2018	NPL	PD	Finalize declaration of L. Gauthier regarding confirmation brief.	0.50	250.00	\$125.00
09/11/2018	NPL	PD	Revise and finalize motion to exceed page limits on confirmation brief.	0.70	250.00	\$175.00
09/11/2018	NPL	PD	Finalize order granting motion to exceed page limit on confirmation brief.	0.40	250.00	\$100.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/11/2018	NPL	PD	Finalize appendix of unpublished opinions in support of confirmation brief.	0.40	250.00	\$100.00
09/11/2018	NPL	PD	Review and reply to email from L. Gauthier regarding plan confirmation pleadings.	0.10	250.00	\$25.00
09/12/2018	TCF	PD	Review and analysis of issues regarding continued confirmation proceedings.	0.10	650.00	\$65.00
09/12/2018	TCF	PD	Telephone conference with A. Friedman regarding continued confirmation proceedings.	0.10	650.00	\$65.00
09/12/2018	WNL	PD	Review and approve Notice of Continuance of Confirmation Hearing; confer with N. Lockwood re: same.	0.10	850.00	\$85.00
09/12/2018	WNL	PD	Review correspondence re: confirmation hearing.	0.10	850.00	\$85.00
09/12/2018	WNL	PD	Review correspondence re: objections to treatment of claim of Michelle Easton.	0.10	850.00	\$85.00
09/12/2018	WNL	PD	Review correspondence re: pending deposition of Michelle Easton.	0.10	850.00	\$85.00
09/12/2018	WNL	PD	Review correspondence re: Appendix of Unpublished Opinions.	0.10	850.00	\$85.00
09/12/2018	WNL	PD	Review correspondence re: exhibits to Ballot Declaration.	0.10	850.00	\$85.00
09/12/2018	WNL	PD	Review changes to draft Declaration of John Bral.	0.20	850.00	\$170.00
09/12/2018	WNL	PD	Review and comment on various pleadings to be filed today.	0.30	850.00	\$255.00
09/12/2018	WNL	PD	Review latest draft of the Confirmation Brief.	0.80	850.00	\$680.00
09/12/2018	TCF	PD	Attend to confirmation issues.	0.60	650.00	\$390.00
09/12/2018	TCF	PD	Review and revise notice of confirmation hearing.	0.10	650.00	\$65.00
09/12/2018	TCF	PD	Review and analysis of issues regarding continuance of confirmation hearing.	0.10	650.00	\$65.00
09/12/2018	TCF	PD	Review and analysis of issues regarding confirmation; attend to same.	0.40	650.00	\$260.00
09/12/2018	TCF	PD	Correspondence to team regarding confirmation hearing and related issues.	0.10	650.00	\$65.00
09/12/2018	TCF	PD	Correspondence N. Lockwood regarding confirmation documents.	0.10	650.00	\$65.00
09/12/2018	NPL	PD	Telephone call with chambers regarding hearing on confirmation of plan.	0.10	250.00	\$25.00
09/12/2018	NPL	PD	Telephone call with T. Flanagan regarding hearing on confirmation of plan; conferred in A. Friedman regarding same.	0.30	250.00	\$75.00
09/12/2018	NPL	PD	Office conference with W. Lobel regarding vacating plan confirmation hearing.	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/12/2018	NPL	PD	Draft notice of errata regarding plan confirmation hearing; forward same to T. Flanagan for review.	0.40	250.00	\$100.00
09/12/2018	NPL	PD	Draft email to A. Friedman regarding errata regarding plan confirmation hearing.	0.10	250.00	\$25.00
09/12/2018	NPL	PD	Finalize notice of vacated hearing on plan confirmation.	0.30	250.00	\$75.00
09/13/2018	WNL	PD	Review and analyze correspondence re: strategy concerning attempts by Beitler to reargue Motion to Strike.	0.10	850.00	\$85.00
09/13/2018	WNL	PD	Review notice of errata regarding plan confirmation.	0.10	850.00	\$85.00
09/13/2018	WNL	PD	Review correspondence re: proposed deposition of J. Bral re: plan confirmation issues.	0.10	850.00	\$85.00
09/13/2018	TCF	PD	Review and analysis of status report and issues.	0.30	650.00	\$195.00
09/13/2018	NPL	PD	Review and reply to email from A. Friedman regarding declaration of J. Bral in support of plan confirmation.	0.10	250.00	\$25.00
09/15/2018	WNL	PD	Review and analyze memorandum in support of plan confirmation and related documents.	2.30	850.00	\$1,955.00
09/17/2018	SAO	PD	Conference call with A. Friedman re Beitler's attempt to depose John Bral a second time.	0.20	750.00	\$150.00
09/17/2018	WNL	PD	Review and analyze plan confirmation issues and arguments.	0.70	850.00	\$595.00
09/17/2018	TCF	PD	Correspond with A. Friedman regarding case and confirmation issues.	0.10	650.00	\$65.00
09/18/2018	WNL	PD	Confer with A. Friedman re: confirmation objections and related issues.	0.90	850.00	\$765.00
09/19/2018	WNL	PD	Review correspondence re: confirmation hearing and related scheduling issues.	0.10	850.00	\$85.00
09/19/2018	WNL	PD	Review Declaration of Tom Lallas and exhibits thereto, including transcript of Michelle Easton deposition and exhibits thereto.	0.50	850.00	\$425.00
09/19/2018	WNL	PD	Review and analyze Beitler objections to confirmation brief.	1.30	850.00	\$1,105.00
09/19/2018	WNL	PD	Review evidentiary objections to Declaration of Adam Meislik.	0.80	850.00	\$680.00
09/19/2018	NPL	PD	Prepare counsel for hearings on plan confirmation, adversary status conferences and chapter 11 status conference.	0.30	250.00	\$75.00
09/20/2018	WNL	PD	Review Loop 76 decision re: plan confirmation issues.	0.30	850.00	\$255.00
09/20/2018	WNL	PD	Review and analyze Weiss-Wolf decision re: plan and disclosure statement issues.	0.20	850.00	\$170.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/20/2018	WNL	PD	Review and analyze decision inm VIII Green I re: creditor classification and treatment issues.	0.20	850.00	\$170.00
09/20/2018	WNL	PD	Review and analyze Tucson Self Storage decision and arguments re: plan confirmation.	0.30	850.00	\$255.00
09/20/2018	WNL	PD	Review and analyze decision in Rexford Properties re: plan issues.	0.20	850.00	\$170.00
09/20/2018	WNL	PD	Review and analyze Paolini decision re: plan confirmation issues.	0.20	850.00	\$170.00
09/20/2018	WNL	PD	Review and analyze decision in NNN Parkway case re: plan confirmation issues.	0.20	850.00	\$170.00
09/20/2018	WNL	PD	Review and analyze additional cases re: plan confirmation issues and applicable law.	1.60	850.00	\$1,360.00
09/20/2018	NPL	PD	Westlaw research regarding case law cited in Beitler objection to plan confirmation brief.	0.60	250.00	\$150.00
09/20/2018	NPL	PD	Draft email to L. Gauthier regarding Weslaw research for Beitler objection to confirmation brief.	0.10	250.00	\$25.00
09/20/2018	NPL	PD	Review and reply to email from T. Flanagan regarding case law research regarding Beitler objection to confirmation brief.	0.10	250.00	\$25.00
09/20/2018	NPL	PD	Review and reply to email from L. Gauthier regarding order granting motion to exceed page limit on confirmation brief.	0.10	250.00	\$25.00
09/21/2018	WNL	PD	Review correspondence re: Beitler Objections to Plan Confirmation.	0.10	850.00	\$85.00
09/21/2018	TCF	PD	Attend to confirmation issues and research regarding same.	3.20	650.00	\$2,080.00
09/24/2018	TCF	PD	Research and analysis regarding confirmation issues.	5.60	650.00	\$3,640.00
09/24/2018	TCF	PD	Continued research and analysis regarding confirmation issues.	3.00	650.00	\$1,950.00
09/25/2018	WNL	PD	Telephone call with A. Friedman re: plan and timing issues.	0.20	850.00	\$170.00
09/25/2018	TCF	PD	Research and analysis regarding confirmation issues and objections.	4.80	650.00	\$3,120.00
09/25/2018	TCF	PD	Research and analysis regarding confirmation support and objections.	4.60	650.00	\$2,990.00
09/26/2018	TCF	PD	Drafting reply to confirmation brief and objections.	6.80	650.00	\$4,420.00
09/26/2018	TCF	PD	Preparation and drafting of reply to confirmation brief and objections.	7.20	650.00	\$4,680.00
09/27/2018	TCF	PD	Research regarding claims estimation.	0.50	650.00	\$325.00
09/27/2018	TCF	PD	Review and revisions to claims estimation pleading.	1.20	650.00	\$780.00
09/27/2018	SAO	PD	Review Reply to Objections to Plan Confirmation and provide comments.	0.30	750.00	\$225.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/27/2018	WNL	PD	Review correspondence and confer with T. Flanagan re: draft confirmation brief.	0.10	850.00	\$85.00
09/27/2018	WNL	PD	Review correspondence re: confirmation brief..	0.20	850.00	\$170.00
09/27/2018	WNL	PD	Review and comment on draft of Reply to Objections to Plan Confirmation.	0.70	850.00	\$595.00
09/27/2018	TCF	PD	Review and revise confirmation reply.	2.60	650.00	\$1,690.00
09/27/2018	TCF	PD	Various communications regarding confirmation reply.	0.40	650.00	\$260.00
09/27/2018	TCF	PD	Research regarding confirmation reply.	0.60	650.00	\$390.00
09/28/2018	NPL	PD	Finalize request for judicial notice regarding reply to opposition to confirmation brief.	0.60	250.00	\$150.00
09/28/2018	WNL	PD	Review and execute Appendix of Unreported Authorities in Support of John Bral's Response to Evidentiary Objections to the Declaration of Adam Meislik.	0.10	850.00	\$85.00
09/28/2018	WNL	PD	Review and execute Bral's Response to Evidentiary Objections to Declaration of Adam Meislik.	0.20	850.00	\$170.00
09/28/2018	WNL	PD	Review draft Reply re: Objection to Plan Confirmation.	0.90	850.00	\$765.00
09/28/2018	WNL	PD	Review request for judicial notice in support of Debtor's Reply to Objections to Plan Confirmation.	0.20	850.00	\$170.00
09/28/2018	TCF	PD	Draft and revise confirmation reply; draft request for judicial notice; finalize same for filing.	2.80	650.00	\$1,820.00
09/28/2018	NPL	PD	Finalize reply to opposition to confirmation brief.	0.40	250.00	\$100.00
09/29/2018	WNL	PD	Review Response to Evidentiary Objections to Adam Meislik Declaration.	0.20	850.00	\$170.00
09/30/2018	TCF	PD	Draft and revise estimation opposition brief; communications with A. Friedman regarding same.	1.40	650.00	\$910.00
10/01/2018	TCF	PD	Review and revise estimation opposition.	2.80	650.00	\$1,820.00
10/01/2018	WNL	PD	Confer with A. Friedman re: Beitler Motion to Estimate Claims.	0.20	850.00	\$170.00
10/01/2018	NPL	PD	Review and reply to email from L. Gauthier regarding errata to reply to opposition to confirmation brief.	0.10	250.00	\$25.00
10/03/2018	TCF	PD	Review and revise estimation opposition.	2.00	650.00	\$1,300.00
10/03/2018	TCF	PD	Correspondence with A. Friedman regarding estimation opposition.	0.10	650.00	\$65.00
10/05/2018	WNL	PD	Review and analyze Opposition to Motion for Order Temporarily Allowing Claims for Voting purposes.	0.50	850.00	\$425.00
10/05/2018	WNL	PD	Review and analyze Opposition to Motion to Temporarily Allow Claims for Voting Purposes.	0.80	850.00	\$680.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/05/2018	WNL	PD	Review and analyze Request For Judicial Notice in support of Opposition to Motion to Temporarily Allow Claims.	0.30	850.00	\$255.00
10/05/2018	NPL	PD	Review and reply to email from L. Gauthier regarding opposition motion to allow claim for purpose of voting; draft email to W. Lobel regarding same.	0.20	250.00	\$50.00
10/05/2018	NPL	PD	Telephone call with W. Lobel regarding opposition to motion to allow claim for purpose of voting.	0.10	250.00	\$25.00
10/05/2018	NPL	PD	Finalize opposition to Beitler Parties' motion to allow claim for voting purposes.	0.90	250.00	\$225.00
10/05/2018	NPL	PD	Finalize request for judicial notice regarding opposition to Beitler parties' motion to allow claim for purposes of voting.	1.80	250.00	\$450.00
10/10/2018	WNL	PD	Review correspondence re: confirmation hearing.	0.10	850.00	\$85.00
10/20/2018	WNL	PD	Review Declaration of Tom Lallas in Support of Reply re: Motion to Estimate Claims.	0.10	850.00	\$85.00
10/20/2018	WNL	PD	Review and comment on analysis of Beitler position concerning Default Judgment not being a secured claim.	0.10	850.00	\$85.00
10/20/2018	WNL	PD	Review Beitler Reply re: Motion to Estimate Claims.	1.60	850.00	\$1,360.00
10/24/2018	SAO	PD	Conference call with A. Friedman re issues raised in opposition to estimation motion that bear upon claims objections.	0.20	750.00	\$150.00
11/02/2018	WNL	PD	Review summary of results of hearing on Motion to Estimate Claims.	0.10	850.00	\$85.00
11/05/2018	NPL	PD	Review electronic notice regarding Court granting motion to allow claim for purposes of voting.	0.10	250.00	\$25.00
11/05/2018	WNL	PD	Analyze claim classification issues in plan and responses to potential objections.	0.70	850.00	\$595.00
11/06/2018	WNL	PD	Review correspondence re: noticed deposition of John Bral and related discovery.	0.10	850.00	\$85.00
11/06/2018	WNL	PD	Telephone conversation with A. Friedman re: newly propounded discovery.	0.10	850.00	\$85.00
11/06/2018	WNL	PD	Review additional correspondence re: scheduled deposition of John Bral and related discovery issues.	0.10	850.00	\$85.00
11/06/2018	WNL	PD	Review analysis of validity of newest discovery requests.	0.10	850.00	\$85.00
11/06/2018	TCF	PD	Review and analysis of issues regarding plan confirmation.	0.40	650.00	\$260.00
11/06/2018	TCF	PD	Review and analysis of correspondence regarding plan issues.	0.20	650.00	\$130.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/06/2018	TCF	PD	Communications with A. Friedman regarding plan issues.	0.10	650.00	\$65.00
11/06/2018	TCF	PD	Communications with W. Lobel regarding case and plan issues.	0.20	650.00	\$130.00
11/06/2018	SAO	PD	Conference call with A. Friedman and G. Pemberton re response to improper discovery propounded by Beitler Parties.	0.40	750.00	\$300.00
11/06/2018	SAO	PD	Review deposition notice to Bral and request for production of document from Beitler Parties prior to conference call with A. Friedman on response.	0.40	750.00	\$300.00
11/07/2018	WNL	PD	Review correspondence re: arguments to be made at confirmation hearing.	0.30	850.00	\$255.00
11/08/2018	WNL	PD	Review and respond to correspondence re: order lodged by Beitler parties on Motion to Temporarily Allow Claims For Voting Purposes.	0.20	850.00	\$170.00
11/08/2018	WNL	PD	Review final lodged order re: temporary Allowance of Claim to Vote.	0.10	850.00	\$85.00
11/08/2018	NPL	PD	Review lodged order regarding motion to temporarily allow claims for voting purposes.	0.10	250.00	\$25.00
11/09/2018	WNL	PD	Review objection to Second Deposition of John Bral.	0.10	850.00	\$85.00
11/09/2018	WNL	PD	Review correspondence re: objection to notice of deposition of John Bral.	0.10	850.00	\$85.00
11/12/2018	SAO	PD	Prepare objection to request for production of documents.	1.10	750.00	\$825.00
11/13/2018	TCF	PD	Review and analysis of plan related issues and confirmation.	2.20	650.00	\$1,430.00
11/13/2018	SAO	PD	Draft Objection to request for production of documents served by Beitler Parties re confirmation hearing.	2.40	750.00	\$1,800.00
11/14/2018	WNL	PD	Telephone conversation with Alan Friedman re: latest discovery issues.	0.10	850.00	\$85.00
11/14/2018	WNL	PD	Review correspondence to G. Klausner regarding issues concerning the deposition of J. Bral.	0.10	850.00	\$85.00
11/14/2018	WNL	PD	Review and analyze changes to Second Amended Plan.	0.20	850.00	\$170.00
11/14/2018	WNL	PD	Review correspondence regarding Motion for Protective Order.	0.10	850.00	\$85.00
11/14/2018	TCF	PD	Review and analysis of plan related issues and confirmation issues; research and review.	3.60	650.00	\$2,340.00
11/14/2018	NPL	PD	Review email from A. Friedman regarding emergency motion for protective order.	0.10	250.00	\$25.00
11/14/2018	SAO	PD	Research cases addressing abusive tactics in a	0.50	750.00	\$375.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			deposition as grounds for protective order.			
11/14/2018	SAO	PD	Begin preparation of motion for protective order barring second deposition of debtor.	0.50	750.00	\$375.00
11/14/2018	SAO	PD	Review documents and stipulations relating to dispute over Beitler Parties attempt to take a second deposition of debtor.	0.40	750.00	\$300.00
11/14/2018	SAO	PD	Conference call with A. Friedman re issues relating to Beitler Parties attempt to take a second deposition of debtor.	0.40	750.00	\$300.00
11/14/2018	SAO	PD	Second conference call with A. Friedman re Beitler Parties refusal to cooperate and need to prepare motion for protective order.	0.10	750.00	\$75.00
11/15/2018	WNL	PD	Review and analyze draft of Motion for Protective Order.	0.70	850.00	\$595.00
11/15/2018	WNL	PD	Review correspondence regarding Motion for Protective order.	0.20	850.00	\$170.00
11/15/2018	WNL	PD	Review correspondence re: need for emergency hearing on protective order.	0.20	850.00	\$170.00
11/15/2018	WNL	PD	Review stipulation re: deadlines relating to confirmation.	0.10	850.00	\$85.00
11/15/2018	WNL	PD	Review correspondence re: notice of emergency hearing.	0.10	850.00	\$85.00
11/15/2018	WNL	PD	Review correspondence re: pleadings to be filed today.	0.10	850.00	\$85.00
11/15/2018	WNL	PD	Review additional correspondence re: timing of filing various pleadings.	0.10	850.00	\$85.00
11/15/2018	WNL	PD	Review Beitler's response to Motion for Protective order.	0.10	850.00	\$85.00
11/15/2018	WNL	PD	Telephone conversation with Alan Friedman re:discovery and confirmation issues.	0.20	850.00	\$170.00
11/15/2018	WNL	PD	Review and revise Motion for Protective Order.	0.60	850.00	\$510.00
11/15/2018	WNL	PD	Telephone calls with Alan Friedman re: Motion For Protective Order.	0.20	850.00	\$170.00
11/15/2018	WNL	PD	Review additional correspondence re: Motion For Protective Order.	0.20	850.00	\$170.00
11/15/2018	WNL	PD	Review and analyze Beitler parties' Opposition to Motion for Protective Order.	0.80	850.00	\$680.00
11/15/2018	WNL	PD	Review letter from G. Klausner in response to Motion for Protective Order.	0.20	850.00	\$170.00
11/15/2018	WNL	PD	Review and analyze all relevant pleadings regarding Motion for Protective Order to find arguments.	1.20	850.00	\$1,020.00
11/15/2018	WNL	PD	Review correspondence regarding changes to Motion for Protective Order.	0.20	850.00	\$170.00

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11/15/2018	TCF	PD	Review and analysis of plan related issues and confirmation issues; research and review; preparation for confirmation.	3.20	650.00	\$2,080.00
11/15/2018	TCF	PD	Plan confirmation related preparation and drafting of memorandum regarding same.	4.80	650.00	\$3,120.00
11/15/2018	NPL	PD	Review and reply to email from L. Gauthier regarding motion for protective order regarding deposition.	0.10	250.00	\$25.00
11/15/2018	NPL	PD	Prepare counsel for confirmation hearing on plan of reorganization.	2.60	250.00	\$650.00
11/15/2018	NPL	PD	Telephone call to chambers regarding emergency hearing on motion for protective order regarding deposition.	0.20	250.00	\$50.00
11/15/2018	NPL	PD	Draft email to L. Gauthier regarding motion for protective order regarding deposition; review and reply to email from L. Gauthier regarding same.	0.10	250.00	\$25.00
11/15/2018	NPL	PD	Review email from T. Flanagan regarding preparation for hearing on plan confirmation.	0.10	250.00	\$25.00
11/15/2018	NPL	PD	Telephone call with chambers regarding emergency hearing on motion for protective order regarding deposition.	0.10	250.00	\$25.00
11/15/2018	NPL	PD	Draft email to A. Friedman regarding emergency hearing on motion for protective order regarding deposition.	0.10	250.00	\$25.00
11/15/2018	NPL	PD	Telephonic notice to parties regarding emergency hearing on motion for protective order regarding deposition.	0.40	250.00	\$100.00
11/15/2018	NPL	PD	Prepare notice of hearing on emergency motion for protective order regarding deposition; forward to W. Lobel for review.	0.60	250.00	\$150.00
11/15/2018	NPL	PD	Prepare declaration of telephonic service regarding hearing on emergency motion for protective order regarding deposition.	0.50	250.00	\$125.00
11/15/2018	NPL	PD	Revisions to pleadings associated with emergency motion for protective order.	3.20	250.00	\$800.00
11/15/2018	NPL	PD	Draft email to G. Klausner and T. Lallas regarding emergency motion for protective order.	0.20	250.00	\$50.00
11/15/2018	NPL	PD	Telephone call with L. Gauthier regarding emergency motion for protective order.	0.20	250.00	\$50.00
11/15/2018	NPL	PD	Telephone call with T. Duarte regarding status of filing of emergency motion for protective order.	0.10	250.00	\$25.00
11/15/2018	SAO	PD	Conference call with A. Friedman re hearing strategy re motion for protective order.	0.20	750.00	\$150.00
11/15/2018	SAO	PD	Draft motion for protective order to bar deposition	4.90	750.00	\$3,675.00

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			of John Bral			
11/15/2018	SAO	PD	Draft declarations in support of motion for protective order re depositions of John Bral.	1.50	750.00	\$1,125.00
11/16/2018	WNL	PD	Review order on allowance of claims for voting purposes.	0.10	850.00	\$85.00
11/16/2018	WNL	PD	Review entered order allowing claims for voting purposes.	0.10	850.00	\$85.00
11/16/2018	WNL	PD	Telephone call with Alan Friedman re: results of hearing on Motion For Protective Order.	0.30	850.00	\$255.00
11/16/2018	WNL	PD	Review correspondence re: preparation for Confirmation Hearing.	0.10	850.00	\$85.00
11/16/2018	WNL	PD	Review issues re: objections to plan confirmation and responses thereto.	0.60	850.00	\$510.00
11/16/2018	WNL	PD	Review and analyze Beitler creditors Opposition to debtors Motion for Protective Order and related pleadings.	0.80	850.00	\$680.00
11/16/2018	TCF	PD	Research and review regarding confirmation related issues.	1.40	650.00	\$910.00
11/16/2018	NPL	PD	Prepare counsel for hearing on emergency motion for protective order.	0.30	250.00	\$75.00
11/16/2018	SAO	PD	Attend hearing on motion for protective order.	1.50	750.00	\$1,125.00
11/16/2018	SAO	PD	Review pleadings in preparation for hearing on motion for protective order.	1.50	750.00	\$1,125.00
11/17/2018	WNL	PD	Review and analyze proposed email to Gary Klausner re: 1129 (a) (5) issues.	0.20	850.00	\$170.00
11/17/2018	WNL	PD	Telephone conference with Alan Friedman re: various pending issues.	0.20	850.00	\$170.00
11/19/2018	WNL	PD	Review correspondence re: fees incurred in connection with the Motion for Protective Order.	0.10	850.00	\$85.00
11/19/2018	WNL	PD	Review correspondence re: recovery of attorney's fees in connection with Motion for Protective Order.	0.10	850.00	\$85.00
11/19/2018	WNL	PD	Review correspondence regarding preparation for confirmation hearing.	0.10	850.00	\$85.00
11/19/2018	WNL	PD	Review correspondence regarding recovery of fees and costs expended in prosecuting Motion for Protective Order.	0.10	850.00	\$85.00
11/21/2018	TCF	PD	Research and review regarding confirmation related issues; plan confirmation hearing preparation.	4.60	650.00	\$2,990.00
11/22/2018	TCF	PD	Plan confirmation hearing preparation.	3.50	650.00	\$2,275.00
11/23/2018	TCF	PD	Plan confirmation hearing preparation; research and review regarding same.	2.00	650.00	\$1,300.00
11/26/2018	WNL	PD	Review correspondence regarding plan issues.	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/26/2018	WNL	PD	Review and analyze transcript of hearing on motion for protective order regarding noticed deposition of J. Bral.	1.60	850.00	\$1,360.00
11/26/2018	TCF	PD	Preparation for confirmation hearing; briefing related thereto.	3.40	650.00	\$2,210.00
11/26/2018	TCF	PD	Review and analysis of issues regarding 1129(a)(5) issues; transcript of hearing on protective order.	0.40	650.00	\$260.00
11/27/2018	TCF	PD	Review and analysis of plan confirmation issues.	2.80	650.00	\$1,820.00
11/27/2018	TCF	PD	Research regarding confirmation issues.	1.80	650.00	\$1,170.00
11/28/2018	WNL	PD	Analyze issues regarding objections to plan confirmation and related issues.	0.70	850.00	\$595.00
11/29/2018	TCF	PD	Preparation for confirmation hearing; drafting of outline for hearing.	5.60	650.00	\$3,640.00
11/30/2018	TCF	PD	Confirmation preparation.	2.60	650.00	\$1,690.00
11/30/2018	TCF	PD	Confirmation preparation / outline / research regarding same.	4.50	650.00	\$2,925.00
				241.20		\$160,630.00

Stay Litigation [B140]

09/04/2018	WNL	SL	Review correspondence and stipulation re: relief from stay to allow distributions from WestCliff.	0.10	850.00	\$85.00
09/26/2018	WNL	SL	Review correspondence re: failure to dismiss cross-complaint.	0.10	850.00	\$85.00
09/26/2018	WNL	SL	Review correspondence re: alleged stay violation.	0.10	850.00	\$85.00
09/26/2018	WNL	SL	Review additional correspondence re: alleged violation of stay.	0.10	850.00	\$85.00
10/24/2018	TCF	SL	Drafting and revisions to 362(k) stay violation motion.	3.40	650.00	\$2,210.00
10/25/2018	TCF	SL	Review and revise 362(k) stay violation motion.	7.20	650.00	\$4,680.00
10/26/2018	TCF	SL	Review and attend to issues regarding 362(k) stay violation motion; communications with A. Friedman regarding same.	0.30	650.00	\$195.00
10/29/2018	WNL	SL	Telephone call with A. Friedman re: Motion for Order for Violation of Stay and Contempt of Court.	0.20	850.00	\$170.00
10/29/2018	WNL	SL	Review and revise draft Motion For Contempt Re; Pending CrossComplaint regarding violation of automatic stay.	1.20	850.00	\$1,020.00
10/29/2018	WNL	SL	Review correspondence re: Motion For Contempt regarding violation of the automatic stay.	0.10	850.00	\$85.00
10/29/2018	WNL	SL	Review and revised Motion for Contempt and supporting Declarations regarding violation of the automatic stay.	0.60	850.00	\$510.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/29/2018	WNL	SL	Review draft declaration of A. Friedman in support of Motion for Contempt regarding violation of automatic stay.	0.20	850.00	\$170.00
10/29/2018	WNL	SL	Review correspondence re: declaration of A. Friedman regarding violation of automatic stay.	0.10	850.00	\$85.00
10/29/2018	WNL	SL	Review revise Motion for Contempt regarding violation of automatic stay.	0.70	850.00	\$595.00
10/29/2018	TCF	SL	Review and revisions to 362(k) stay violation motion.	2.80	650.00	\$1,820.00
10/29/2018	TCF	SL	Draft and revise, research regarding 362(k) stay violation motion; points and authorities; declarations and support; various communications and revisions to same.	3.60	650.00	\$2,340.00
10/29/2018	TCF	SL	Finalize stay violation motion and declarations.	0.60	650.00	\$390.00
10/29/2018	TCF	SL	Review and analysis of stay violation issues; numerous correspondence and communications in connection with finalization of stay violation motion; review and revise motion and supporting declarations.	2.00	650.00	\$1,300.00
10/29/2018	NPL	SL	Review and reply to multiple emails from T. Flanagan regarding information needed from motion for violation of automatic stay; attention to review of same.	0.60	250.00	\$150.00
10/30/2018	WNL	SL	Review correspondence re: finalization of Motion for Contempt.	0.10	850.00	\$85.00
10/30/2018	WNL	SL	Review Appendix of Unpublished Opinions and execute Notice re: same.	0.10	850.00	\$85.00
10/30/2018	WNL	SL	Review Request for Judicial Notice in support of Motion for Contempt.	0.10	850.00	\$85.00
10/30/2018	WNL	SL	Review correspondence re: hearing date for Motion for Contempt.	0.10	850.00	\$85.00
10/30/2018	TCF	SL	Review and revise declarations and motion in support of stay violation motion; finalize for filing.	1.60	650.00	\$1,040.00
10/30/2018	TCF	SL	Communications with A. Friedman regarding motion in support of stay violation motion and support.	0.20	650.00	\$130.00
10/30/2018	NPL	SL	Review multiple emails from L. Gauthier, A. Friedman and T. Flanagan regarding motion for violation of automatic stay.	0.30	250.00	\$75.00
10/30/2018	NPL	SL	Westlaw research regarding unpublished cases cited in contempt motion regarding violation of automatic stay.	0.30	250.00	\$75.00
10/30/2018	NPL	SL	Prepare appendix of unpublished cases regarding contempt motion regarding violation of automatic	0.30	250.00	\$75.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			stay; forward same to W. Lobel for review.			
10/30/2018	NPL	SL	Review and reply to email from L. Gauthier regarding contempt motion regarding violation of automatic stay.	0.10	250.00	\$25.00
10/30/2018	NPL	SL	Draft email to L. Gauthier regarding appendix of unpublished cases regarding contempt motion regarding violation of automatic stay.	0.10	250.00	\$25.00
10/30/2018	NPL	SL	Review notice of hearing regarding contempt motion regarding violation of automatic stay; attention to dates and deadlines regarding same.	0.20	250.00	\$50.00
10/30/2018	NPL	SL	Draft email to J. O'Keefe and B. Anavim regarding dates and deadlines associated with contempt motion.	0.10	250.00	\$25.00
11/01/2018	NPL	SL	Review electronic filing regarding hearing date change for contempt motion regarding violation of automatic stay; attention to dates and deadlines regarding same.	0.20	250.00	\$50.00
11/05/2018	WNL	SL	Analyze issues re: Beitler refusal to dismiss cross complaint.	0.40	850.00	\$340.00
11/28/2018	TCF	SL	Communication with A. Friedman regarding stay violation issues.	0.10	650.00	\$65.00
				28.30	\$18,375.00	
TOTAL SERVICES FOR THIS MATTER:						\$201,480.00

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Expenses

09/04/2018	AS	Attorney Service [E107] Case Anywhere LLC, Bral/Beitler Mediation WNL	121.40
09/05/2018	AS	Attorney Service [E107] Dop Off Inc., courtesy copies to Judges Chambers, WNL	24.99
09/06/2018	LN	10601.00001 Lexis Charges for 09-06-18	0.47
09/07/2018	RE2	SCAN/COPY (48 @0.10 PER PG)	4.80
09/09/2018	LN	10601.00001 Lexis Charges for 09-09-18	113.85
09/10/2018	CC	Conference Call [E105] AT&T Conference Call, WNL	12.62
09/11/2018	LN	10601.00001 Lexis Charges for 09-11-18	18.67
09/11/2018	RE2	SCAN/COPY (35 @0.10 PER PG)	3.50
09/11/2018	RE2	SCAN/COPY (56 @0.10 PER PG)	5.60
09/11/2018	RE2	SCAN/COPY (122 @0.10 PER PG)	12.20
09/11/2018	RE2	SCAN/COPY (96 @0.10 PER PG)	9.60
09/11/2018	RE2	SCAN/COPY (65 @0.10 PER PG)	6.50
09/11/2018	RE2	SCAN/COPY (34 @0.10 PER PG)	3.40
09/12/2018	RE2	SCAN/COPY (17 @0.10 PER PG)	1.70
09/12/2018	TR	Transcript [E116] Briggs Reporting Company (copies), WNL	15.39
09/13/2018	TE	Travel Expense [E110] Long Beach Court House, WNL	5.25
09/17/2018	OS	Case Anywhere LLC, Inv. 139918, WNL	120.00
09/19/2018	RE2	SCAN/COPY (198 @0.10 PER PG)	19.80
09/20/2018	LN	10601.00001 Lexis Charges for 09-20-18	25.72

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09/20/2018	RE2	SCAN/COPY (198 @0.10 PER PG)	19.80
09/20/2018	RE2	SCAN/COPY (23 @0.10 PER PG)	2.30
09/20/2018	RE2	SCAN/COPY (39 @0.10 PER PG)	3.90
09/20/2018	TE	Travel Expense [E110] County of orange -Short Term parking, WNL	10.00
09/21/2018	RE2	SCAN/COPY (378 @0.10 PER PG)	37.80
09/21/2018	RE2	SCAN/COPY (198 @0.10 PER PG)	19.80
09/24/2018	LN	10601.00001 Lexis Charges for 09-24-18	589.33
09/24/2018	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
09/24/2018	RE2	SCAN/COPY (15 @0.10 PER PG)	1.50
09/24/2018	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
09/24/2018	RE2	SCAN/COPY (10 @0.10 PER PG)	1.00
09/25/2018	FF	Filing Fee [E112] Los Angeles Superior Court, WNL	9.00
09/27/2018	LN	10601.00001 Lexis Charges for 09-27-18	39.68
09/27/2018	RE2	SCAN/COPY (28 @0.10 PER PG)	2.80
09/28/2018	RE2	SCAN/COPY (31 @0.10 PER PG)	3.10
09/28/2018	RE2	SCAN/COPY (59 @0.10 PER PG)	5.90
09/28/2018	RE2	SCAN/COPY (28 @0.10 PER PG)	2.80
09/28/2018	RE2	SCAN/COPY (106 @0.10 PER PG)	10.60
09/28/2018	SO	Secretarial Overtime, B. Anavim	37.50
09/28/2018	SO	Secretarial Overtime, J. O'Keefe	108.92
10/01/2018	PO	Postage [E108] Bral Errata to Reply - courtesy copies to Judges Chambers, WNL	15.43

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10/01/2018	RE2	SCAN/COPY (32 @0.10 PER PG)	3.20
10/05/2018	PO	Postage [E108] Bral Opposition to Mtn- courtesy copies to Judges Chambers, WNL	31.22
10/05/2018	RE2	SCAN/COPY (100 @0.10 PER PG)	10.00
10/05/2018	RE2	SCAN/COPY (32 @0.10 PER PG)	3.20
10/05/2018	RE2	SCAN/COPY (182 @0.10 PER PG)	18.20
10/05/2018	RE2	SCAN/COPY (300 @0.10 PER PG)	30.00
10/23/2018	FF	Filing Fee [E112] Bral v. Westcliff: Ntc of Cont. SC, WNL	8.25
10/26/2018	FE	Federal Express [E108] 773572145201	32.95
10/29/2018	LN	10601.00001 Lexis Charges for 10-29-18	22.46
10/29/2018	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
10/30/2018	LN	10601.00001 Lexis Charges for 10-30-18	0.92
10/31/2018	PO	Postage [E108] OC Mail - JMO	1.62
11/15/2018	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
11/15/2018	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
11/16/2018	FE	Federal Express [E108]	82.90
11/16/2018	LN	10601.00001 Lexis Charges for 11-16-18	264.55
11/21/2018	LN	10601.00001 Lexis Charges for 11-21-18	37.49
11/26/2018	AS	Attorney Service [E107] DDS, Inv. 404812, B. Anavim	97.70
11/30/2018	PAC	Pacer - Court Research	121.80

Total Expenses for this Matter **\$2,218.98**

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REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For current services rendered through 11/30/2018

Total Fees	\$201,480.00
Chargeable costs and disbursements	\$2,218.98
Total Due on Current Invoice.....	\$203,698.98

Outstanding Balance from prior Invoices as of 11/30/2018 **(May not reflect recent payments)**

Invoice Number	Invoice Date	Fees Billed	Expenses Billed	Balance Due
118521	01/31/2018	\$64,977.50	\$1.40	\$64,978.90
118768	02/28/2018	\$89,105.00	\$6,717.72	\$95,822.72
119267	03/31/2018	\$170,795.00	\$818.42	\$171,613.42
119338	04/30/2018	\$241,285.00	\$12,901.06	\$254,186.06
119732	06/13/2018	\$165,330.00	\$2,241.54	\$167,571.54
119915	06/30/2018	\$127,527.50	\$476.66	\$128,004.16
120454	07/31/2018	\$120,280.00	\$2,092.83	\$122,372.83
120456	08/31/2018	\$83,337.00	\$1,155.30	\$84,492.30
Total Amount Due on Current and Prior Invoices				\$1,292,740.91

Pachulski Stang Ziehl & Jones LLP

January 30, 2019

Invoice 121257

Client 10601

Matter 00001

WNL

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/2018

FEES	\$94,400.00
EXPENSES	\$1,256.33
TOTAL CURRENT CHARGES	\$95,656.33
BALANCE FORWARD	\$1,292,740.91
TOTAL BALANCE DUE	\$1,388,397.24

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		11.40	\$9,690.00
CA	Case Administration [B110]	1.50	\$575.00
CO	Claims Admin/Objections[B310]	0.80	\$632.50
LN	Litigation (Non-Bankruptcy)	1.20	\$1,020.00
PD	Plan & Disclosure Stmt. [B320]	104.20	\$73,177.50
SL	Stay Litigation [B140]	15.30	\$9,305.00
		134.40	\$94,400.00

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	7.90	\$1,975.00
NPL	Lockwood, Nancy P. F.	Paralegal	375.00	0.40	\$150.00
SAOS	O'Keefe, Sean A	Counsel	750.00	3.50	\$2,625.00
TCF	Flanagan, Tavi C.	Counsel	650.00	72.80	\$47,320.00
WNL	Lobel, William N.	Partner	850.00	49.80	\$42,330.00
				134.40	\$94,400.00

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Working Meals [E111]	\$205.10
Lexis/Nexis- Legal Research [E	\$938.93
Pacer - Court Research	\$2.00
Reproduction/ Scan Copy	\$58.70

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Transcript [E116]	\$51.60
	<hr/> <hr/> \$1,256.33

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/11/2018	WNL		Finish preparation for confirmation hearing.	3.60	850.00	\$3,060.00
12/11/2018	WNL		Attendance at confirmation hearing and participate in settlement negotiations.	7.50	850.00	\$6,375.00
12/11/2018	WNL		Review correspondence re: issues concerning discounting of attorneys fees.	0.10	850.00	\$85.00
12/15/2018	WNL		Review settlement term sheet and analyze settlement issues.	0.20	850.00	\$170.00
				11.40		\$9,690.00

Case Administration [B110]

12/05/2018	NPL	CA	Review debtor docket regarding outstanding dates and deadlines regarding plan confirmation.	0.30	250.00	\$75.00
12/07/2018	NPL	CA	Review critical date memorandum; attention to dates and deadlines regarding same.	0.30	250.00	\$75.00
12/11/2018	TCF	CA	Telephone conference with A. Friedman regarding case administrative issues and scheduling.	0.10	650.00	\$65.00
12/12/2018	WNL	CA	Review latest critical date summary.	0.10	850.00	\$85.00
12/12/2018	TCF	CA	Correspondence with N. Lockwood regarding confirmation hearing and settlement negotiations.	0.10	650.00	\$65.00
12/12/2018	NPL	CA	Review and reply to email from L. Gauthier regarding updated critical dates memorandum; attention to dates and deadlines regarding same.	0.40	250.00	\$100.00
12/12/2018	NPL	CA	Review and reply to email from A. Friedman regarding continued dates and deadlines.	0.10	250.00	\$25.00
12/18/2018	WNL	CA	Review Monthly Operating report for November, 2018.	0.10	850.00	\$85.00
				1.50		\$575.00

Claims Admin/Objections[B310]

12/06/2018	WNL	CO	Review correspondence re: claims treatment and Plan confirmation issues.	0.40	850.00	\$340.00
12/07/2018	NPL	CO	Telephone call with T. Flanagan regarding motion for protective order.	0.10	375.00	\$37.50
12/11/2018	WNL	CO	Review correspondence re: Reply Brief re: Motion to Strike Claims.	0.10	850.00	\$85.00
12/20/2018	WNL	CO	Review correspondence re: Reply Brief re: Motion to Strike Claims.	0.20	850.00	\$170.00
				0.80		\$632.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Litigation (Non-Bankruptcy)						
12/04/2018	WNL	LN	Review additional correspondence re: dismissal of cross-complaint.	0.10	850.00	\$85.00
12/07/2018	WNL	LN	Review and analyze Beitler Opposition to Motion for Contempt and related correspondence.	0.90	850.00	\$765.00
12/10/2018	WNL	LN	Review declarations in opposition to Motion for Contempt.	0.20	850.00	\$170.00
				1.20		\$1,020.00

Plan & Disclosure Stmt. [B320]

11/12/2018	WNL	PD	Analyze response to each of the objections posed by Beitler Parties to plan confirmation.	0.70	850.00	\$595.00
11/15/2018	NPL	PD	Review and reply to multiple emails from A. Friedman and L. Gauthier regarding emergency motion for protective order.	0.30	375.00	\$112.50
11/16/2018	WNL	PD	Analyze responses to Beitler objections and consider alternative arguments in response thereto.	0.80	850.00	\$680.00
11/19/2018	WNL	PD	Review correspondence re: withdrawal of Request for Production of Documents.	0.40	850.00	\$340.00
11/21/2018	WNL	PD	Analyze Beitler objections to plan confirmation and begin preparation of responses to each objection.	0.60	850.00	\$510.00
12/01/2018	TCF	PD	Confirmation preparation, drafting of outline, evidentiary issues, research and analysis regarding plan issues.	6.80	650.00	\$4,420.00
12/02/2018	WNL	PD	Review and analyze pleadings in preparation for pending confirmation hearing.	2.40	850.00	\$2,040.00
12/02/2018	WNL	PD	Review and analyze correspondence re: demand for additional discovery re: plan issues.	0.20	850.00	\$170.00
12/02/2018	TCF	PD	Evidence regarding plan confirmation.	5.20	650.00	\$3,380.00
12/02/2018	TCF	PD	Continued confirmation preparation, drafting of outline, evidentiary issues, research and analysis regarding plan issues.	6.40	650.00	\$4,160.00
12/03/2018	TCF	PD	Drafting of confirmation outline; evidence; preparation for meeting regarding same.	5.80	650.00	\$3,770.00
12/03/2018	TCF	PD	Preparation for confirmation hearing; various communications regarding same.	4.60	650.00	\$2,990.00
12/03/2018	NPL	PD	Review entered order granting protective order.	0.10	250.00	\$25.00
12/04/2018	WNL	PD	Review and analyze summary of confirmation issues and organized summary of plan issues and process in Court to achieve confirmation.	0.90	850.00	\$765.00
12/04/2018	WNL	PD	Review and analyze draft of brief on Non-Applicability of 1129 (a) (5).	0.40	850.00	\$340.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/04/2018	TCF	PD	Review and revise confirmation outline and preparation; evidentiary support.	3.80	650.00	\$2,470.00
12/04/2018	TCF	PD	Telephone conference with A. Friedman regarding confirmation preparation; evidentiary support.	0.20	650.00	\$130.00
12/05/2018	WNL	PD	Confer with J. Bral, A. Friedman, S. O'Keefe and A. Meidslik re: preparation for confirmation hearing.	4.50	850.00	\$3,825.00
12/05/2018	TCF	PD	Preparation for confirmation hearing.	4.80	650.00	\$3,120.00
12/05/2018	TCF	PD	Research and analysis regarding confirmation issues.	3.40	650.00	\$2,210.00
12/05/2018	NPL	PD	Prepare W. Lobel for meeting on plan confirmation; confer with A. Friedman and W. Lobel regarding same.	0.60	250.00	\$150.00
12/05/2018	SAO	PD	Conference with client, A. Friedman, W. Lobel, A. Meislik re preparation for contested confirmation hearing.	3.00	750.00	\$2,250.00
12/05/2018	SAO	PD	Draft rehabilitation script for testimony of John Bral and hearing on plan confirmation.	0.50	750.00	\$375.00
12/06/2018	WNL	PD	Telephone call with Alan Friedman re: confirmation issues and arguments.	0.40	850.00	\$340.00
12/06/2018	WNL	PD	Review correspondence re: reasons for impairment of Michelle Easton claim.	0.10	850.00	\$85.00
12/06/2018	WNL	PD	Review correspondence re: preparation of John Bral for his testimony at the confirmation hearing.	0.20	850.00	\$170.00
12/06/2018	WNL	PD	Review draft rehab script for John Bral.	0.20	850.00	\$170.00
12/06/2018	TCF	PD	Telephone conference with W. Lobel regarding plan issues and preparation for confirmation hearing.	0.20	650.00	\$130.00
12/06/2018	TCF	PD	Various communications with team regarding plan, and preparation for confirmation hearing.	0.40	650.00	\$260.00
12/06/2018	NPL	PD	Telephone call with T. Flanagan regarding opposition to motion for protective order; draft email to T. Flanagan regarding same.	0.20	250.00	\$50.00
12/07/2018	WNL	PD	Telephone conversation with A. Friedman re: preparation for confirmation hearing.	0.20	850.00	\$170.00
12/07/2018	WNL	PD	Review correspondence re: negotiations with committee.	0.20	850.00	\$170.00
12/07/2018	WNL	PD	Review Second Amended POlan and Disclosure Statement and begin outline of arguments to be made at the confirmation hearing.	1.90	850.00	\$1,615.00
12/07/2018	WNL	PD	Analyze legal issues relevant to plan confirmation.	0.80	850.00	\$680.00
12/07/2018	TCF	PD	Various communications with team regarding confirmation issues and preparation.	0.40	650.00	\$260.00
12/07/2018	TCF	PD	Telephone conference with A. Friedman regarding confirmation issues and prep.	0.60	650.00	\$390.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/07/2018	NPL	PD	Prepare counsel for preconfirmation meeting.	0.60	250.00	\$150.00
12/07/2018	NPL	PD	Caselaw research regarding motion for protective order; draft email to T. Flanagan regarding same.	0.30	250.00	\$75.00
12/08/2018	WNL	PD	read and analyze all pleadings filed in connection with plan confirmation and begin preparation of arguments for confirmation hearings.	5.70	850.00	\$4,845.00
12/08/2018	TCF	PD	Attend to confirmation issues and preparation.	1.20	650.00	\$780.00
12/08/2018	TCF	PD	Telephone conference with A. Friedman regarding plan confirmation hearing preparation.	0.20	650.00	\$130.00
12/09/2018	WNL	PD	Review relevant pleadings and prepare arguments for confirmation hearing.	2.80	850.00	\$2,380.00
12/09/2018	WNL	PD	Confer with Alan Friedman to prepare for confirmation hearing.	2.40	850.00	\$2,040.00
12/09/2018	WNL	PD	Review and analyze significance of Beitler request for judicial notice.	0.20	850.00	\$170.00
12/09/2018	WNL	PD	Review and create argument re: inapplicability of 1129 (a) (5) in an individual case.	0.30	850.00	\$255.00
12/09/2018	TCF	PD	Research review and drafting regarding plan confirmation and hearing preparation.	6.50	650.00	\$4,225.00
12/10/2018	WNL	PD	Telephone call with Alan Friedman re: deposition transcript of Michelle Easton and other matters related to the confirmation hearing.	0.10	850.00	\$85.00
12/10/2018	WNL	PD	Review various pleadings and prepare arguments for confirmation hearing.	6.80	850.00	\$5,780.00
12/10/2018	WNL	PD	Telephone calls with A. Friedman re: preparation for confirmation hearing.	0.30	850.00	\$255.00
12/10/2018	TCF	PD	Continued research, review and drafting regarding plan confirmation and hearing preparation.	2.80	650.00	\$1,820.00
12/10/2018	TCF	PD	Research regarding plan issues.	5.20	650.00	\$3,380.00
12/10/2018	NPL	PD	Prepare W. Lobel for plan confirmation hearing; review email from A. Friedman regarding same.	0.60	250.00	\$150.00
12/11/2018	NPL	PD	Office conference with W. Lobel regarding plan confirmation hearing.	0.10	250.00	\$25.00
12/11/2018	NPL	PD	Review and reply to email from L. Gauthier regarding plan confirmation hearing.	0.10	250.00	\$25.00
12/11/2018	NPL	PD	Prepare W. Lobel for plan confirmation hearing; research applicable case law regarding same.	1.90	250.00	\$475.00
12/12/2018	WNL	PD	Telephone call with A. Friedman re: remaining settlement issues.	0.10	850.00	\$85.00
12/12/2018	WNL	PD	Review correspondence re: issues concerning the plan confirmation process.	0.20	850.00	\$170.00
12/12/2018	WNL	PD	Review correspondence re: request by Beitler to	0.10	850.00	\$85.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			continue hearing dates.			
12/12/2018	TCF	PD	Review and analysis of issues regarding confirmation hearing and settlement negotiations.	0.20	650.00	\$130.00
12/12/2018	NPL	PD	Office conference with W. Lobel regarding status of plan confirmation hearing.	0.20	250.00	\$50.00
12/12/2018	NPL	PD	Draft email to H. Martens of Brigg Reporting regarding transcript request for plan confirmation hearing.	0.10	250.00	\$25.00
12/13/2018	WNL	PD	Review and analyze proposed bullet points of potential settlement with Beitler.	0.20	850.00	\$170.00
12/13/2018	WNL	PD	Review correspondence re: amount of professional fees.	0.10	850.00	\$85.00
12/13/2018	WNL	PD	Review summary of new dates for pending motions and plan confirmation.	0.10	850.00	\$85.00
12/14/2018	WNL	PD	Telephone call with A. Friedman re: settlement issues.	0.20	850.00	\$170.00
12/14/2018	NPL	PD	Review transcript from plan confirmation hearing.	0.40	250.00	\$100.00
12/15/2018	WNL	PD	Review and analyze transcript of plan confirmation hearing.	0.80	850.00	\$680.00
12/15/2018	WNL	PD	Review correspondence re: settlement issues.	0.20	850.00	\$170.00
12/17/2018	WNL	PD	Telephone call with A. Friedman re: settlement negotiations and related issues.	0.20	850.00	\$170.00
12/17/2018	WNL	PD	Telephone call with A. Friedman re: settlement issues.	0.10	850.00	\$85.00
12/19/2018	WNL	PD	Review correspondence re: impasse in settlement negotiations.	0.10	850.00	\$85.00
12/19/2018	WNL	PD	Review and comment on proposed response to Tom Lallas re: status of settlement.	0.10	850.00	\$85.00
12/20/2018	TCF	PD	Review and analysis of settlement negotiations.	0.20	650.00	\$130.00
12/22/2018	WNL	PD	Review correspondence re: settlement issues and John Bral's position as to settlement.	0.10	850.00	\$85.00
12/28/2018	WNL	PD	Telephone conversation with Alan Friedman re: preparation for confirmation hearing.	0.20	850.00	\$170.00
104.20						\$73,177.50

Stay Litigation [B140]

12/06/2018	TCF	SL	Review and analysis of issues regarding contempt and stay violation; pleadings and cases.	0.40	650.00	\$260.00
12/06/2018	TCF	SL	Research and review regarding contempt and stay violation.	1.20	650.00	\$780.00
12/06/2018	TCF	SL	Review and analysis of Beitler's opposition to stay violation motion.	0.20	650.00	\$130.00

Pachulski Stang Ziehl & Jones LLP
Bral, John Jean
10601 00001

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/06/2018	TCF	SL	Correspondence A. Friedman regarding opposition to stay violation motion.	0.10	650.00	\$65.00
12/08/2018	TCF	SL	Attend to issues regarding stay violation and response.	1.00	650.00	\$650.00
12/10/2018	TCF	SL	Drafting of reply to opposition to sanction and contempt motion.	1.40	650.00	\$910.00
12/10/2018	NPL	SL	Review and research case law associated contempt motion regarding violation of the automatic stay; draft multiple emails to T. Flanagan regarding same.	1.40	250.00	\$350.00
12/11/2018	TCF	SL	Drafting of reply to opposition to automatic stay sanction and contempt motion.	6.80	650.00	\$4,420.00
12/11/2018	TCF	SL	Research regarding automatic stay sanction and contempt motion.	2.40	650.00	\$1,560.00
12/12/2018	NPL	SL	Review and reply to email from T. Flanagan regarding reply to opposition to contempt motion regarding automatic stay; attention to same.	0.20	250.00	\$50.00
12/21/2018	TCF	SL	Review and analysis of recent Ninth Circuit decision on stay violations and sanctions; correspond with A. Friedman regarding same.	0.20	650.00	\$130.00
				15.30	\$9,305.00	
TOTAL SERVICES FOR THIS MATTER:						\$94,400.00

Pachulski Stang Ziehl & Jones LLP
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Expenses

12/03/2018	LN	10601.00001 Lexis Charges for 12-03-18	206.88
12/04/2018	RE2	SCAN/COPY (39 @0.10 PER PG)	3.90
12/05/2018	BM	Business Meal [E111] Jersey Mikes, working meal, WNL	66.66
12/05/2018	BM	Business Meal [E111] East Cost Bagel, working meal, J. O'keefe	20.44
12/05/2018	LN	10601.00001 Lexis Charges for 12-05-18	325.15
12/05/2018	RE2	SCAN/COPY (27 @0.10 PER PG)	2.70
12/05/2018	RE2	SCAN/COPY (117 @0.10 PER PG)	11.70
12/06/2018	LN	10601.00001 Lexis Charges for 12-06-18	24.72
12/07/2018	LN	10601.00001 Lexis Charges for 12-07-18	56.82
12/07/2018	LN	10601.00001 Lexis Charges for 12-07-18	20.64
12/07/2018	RE2	SCAN/COPY (48 @0.10 PER PG)	4.80
12/07/2018	RE2	SCAN/COPY (56 @0.10 PER PG)	5.60
12/07/2018	RE2	SCAN/COPY (118 @0.10 PER PG)	11.80
12/07/2018	RE2	SCAN/COPY (34 @0.10 PER PG)	3.40
12/07/2018	RE2	SCAN/COPY (34 @0.10 PER PG)	3.40
12/07/2018	RE2	SCAN/COPY (25 @0.10 PER PG)	2.50
12/07/2018	RE2	SCAN/COPY (65 @0.10 PER PG)	6.50
12/07/2018	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
12/10/2018	LN	10601.00001 Lexis Charges for 12-10-18	172.75
12/11/2018	BM	Business Meal [E111] Flennor's, working meal, WNL	118.00

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12/11/2018	LN	10601.00001 Lexis Charges for 12-11-18	131.97
12/14/2018	TR	Transcript [E116] Briggs Reporting Company, Inv. 20048	51.60
12/31/2018	PAC	Pacer - Court Research	2.00
Total Expenses for this Matter			\$1,256.33

Pachulski Stang Ziehl & Jones LLP
Bral, John Jean
10601 00001

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REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For current services rendered through 01/30/2019

Total Fees	\$94,400.00
Chargeable costs and disbursements	\$1,256.33
Total Due on Current Invoice.....	\$95,656.33

Outstanding Balance from prior Invoices as of 12/31/2018 **(May not reflect recent payments)**

Invoice Number	Invoice Date	Fees Billed	Expenses Billed	Balance Due
118521	01/31/2018	\$64,977.50	\$1.40	\$64,978.90
118768	02/28/2018	\$89,105.00	\$6,717.72	\$95,822.72
119267	03/31/2018	\$170,795.00	\$818.42	\$171,613.42
119338	04/30/2018	\$241,285.00	\$12,901.06	\$254,186.06
119732	06/13/2018	\$165,330.00	\$2,241.54	\$167,571.54
119915	06/30/2018	\$127,527.50	\$476.66	\$128,004.16
120454	07/31/2018	\$120,280.00	\$2,092.83	\$122,372.83
120456	08/31/2018	\$83,337.00	\$1,155.30	\$84,492.30
120968	11/30/2018	\$201,480.00	\$2,218.98	\$203,698.98
Total Amount Due on Current and Prior Invoices				\$1,388,397.24

Pachulski Stang Ziehl & Jones LLP

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

February 12, 2019
Invoice 121588
Client 10601
Matter 00001
WNL

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 01/31/2019

FEES	\$10,583.50
EXPENSES	\$88.30
TOTAL CURRENT CHARGES	\$10,671.80
BALANCE FORWARD	\$1,388,397.24
TOTAL BALANCE DUE	\$1,399,069.04

Pachulski Stang Ziehl & Jones LLP
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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
CA	Case Administration [B110]	2.40	\$858.00
FE	Fee/Employment Application	0.60	\$537.00
LN	Litigation (Non-Bankruptcy)	0.50	\$189.50
PD	Plan & Disclosure Stmt. [B320]	12.20	\$8,418.00
SL	Stay Litigation [B140]	0.90	\$581.00
		16.60	\$10,583.50

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	3.90	\$975.00
SAOS	O'Keefe, Sean A	Counsel	750.00	0.40	\$300.00
TCF	Flanagan, Tavi C.	Counsel	695.00	8.50	\$5,907.50
WNL	Lobel, William N.	Partner	895.00	3.80	\$3,401.00
				16.60	\$10,583.50

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Guest Parking [E124]	\$20.00
Pacer - Court Research	\$0.60
Reproduction/ Scan Copy	\$16.10
Transcript [E116]	\$51.60
	\$88.30

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Case Administration [B110]						
01/08/2019	NPL	CA	Attention to outstanding dates and deadlines associated with the status conference, plan confirmation and motion to strike.	0.30	250.00	\$75.00
01/09/2019	WNL	CA	Review updated critical dates memo.	0.10	895.00	\$89.50
01/09/2019	NPL	CA	Review and reply to email from L. Gauthier regarding critical dates and deadline memorandum.	0.10	250.00	\$25.00
01/11/2019	NPL	CA	Attention to dates and deadlines associated with continued hearing dates on Court's own motion.	0.20	250.00	\$50.00
01/16/2019	WNL	CA	Review Monthly Operating Report for December, 2018.	0.10	895.00	\$89.50
01/17/2019	WNL	CA	Review latest revised critical date summary.	0.10	895.00	\$89.50
01/17/2019	NPL	CA	Review and reply to email from L. Gauthier regarding critical date and deadline memorandum; attention to same.	0.20	250.00	\$50.00
01/23/2019	NPL	CA	Attention to dates and deadlines continued resulting from government shutdown.	0.30	250.00	\$75.00
01/25/2019	NPL	CA	Review debtor docket regarding outstanding matters, update case status regarding same.	0.40	250.00	\$100.00
01/28/2019	NPL	CA	Attention to outstanding dates and deadlines, forward to T. Flanagan.	0.20	250.00	\$50.00
01/31/2019	WNL	CA	Review updated critical dates summary.	0.10	895.00	\$89.50
01/31/2019	NPL	CA	Review and reply to email from L. Gauthier regarding critical date memorandum.	0.10	250.00	\$25.00
01/31/2019	NPL	CA	Attention to dates and deadlines associated with critical date and deadline memorandum.	0.20	250.00	\$50.00
				2.40	\$858.00	

Fee/Employment Application

01/25/2019	WNL	FE	Review and revise pre-bill for December.	0.60	895.00	\$537.00
				0.60	\$537.00	

Litigation (Non-Bankruptcy)

01/18/2019	NPL	LN	Review and reply to email from L. Gauthier regarding Bral v. Westcliff status report.	0.10	250.00	\$25.00
01/18/2019	NPL	LN	Finalize status conference regarding Westcliff v. Bral.	0.30	250.00	\$75.00
01/29/2019	WNL	LN	Review correspondence re: status conference in Bral V Westcliff Investors.	0.10	895.00	\$89.50
				0.50	\$189.50	

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 Bral, John Jean
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Plan & Disclosure Stmt. [B320]

01/02/2019	WNL	PD	Review correspondence re: status of settlement negotiations.	0.10	895.00	\$89.50
01/04/2019	WNL	PD	Review correspondence from G. Klausner re: settlement issues.	0.10	895.00	\$89.50
01/04/2019	WNL	PD	Telephone call with A. Friedman re: settlement and timing issues.	0.20	895.00	\$179.00
01/04/2019	WNL	PD	Review correspondence re: issues concerning settlement negotiations.	0.10	895.00	\$89.50
01/04/2019	WNL	PD	Review correspondence re: settlement negotiations.	0.10	895.00	\$89.50
01/05/2019	WNL	PD	Review correspondence re: settlement negotiations.	0.10	895.00	\$89.50
01/07/2019	WNL	PD	Review and respond to correspondence re: action to be taken.	0.10	895.00	\$89.50
01/07/2019	WNL	PD	Telephone call with Alan Friedman re: conversation with Gary Klausner and startegy going forward.	0.30	895.00	\$268.50
01/07/2019	WNL	PD	Review correspondence re:conversation with G. Klausner concerning settlement negotiations.	0.10	895.00	\$89.50
01/07/2019	WNL	PD	Confer with A. Friedman re: settlement issues and strategy.	0.30	895.00	\$268.50
01/07/2019	TCF	PD	Review and analysis of plan preparation and acton to be taking.	0.20	695.00	\$139.00
01/07/2019	TCF	PD	Telephone conference with A. Friedman regarding preparation for confirmation hearing.	0.10	695.00	\$69.50
01/07/2019	TCF	PD	Preparation for confirmation hearing.	4.50	695.00	\$3,127.50
01/07/2019	SAO	PD	Conference call with A. Friedman re confirmation hearing and scheduling of remaining hearings based upon negotiations with other side.	0.40	750.00	\$300.00
01/08/2019	WNL	PD	Review order continuing confirmation hearing and other hearings; confer with N. Lockwood re: same.	0.10	895.00	\$89.50
01/08/2019	TCF	PD	Preparation for confirmation hearing.	2.20	695.00	\$1,529.00
01/08/2019	TCF	PD	Correspondence A. Friedman regarding plan issues.	0.20	695.00	\$139.00
01/08/2019	NPL	PD	Review and reply to email from L. Gauthier regarding continued dates and deadlines related to plan confirmation.	0.10	250.00	\$25.00
01/09/2019	WNL	PD	Review correspondence re: continuance of confirmation hearing and related issues.	0.20	895.00	\$179.00
01/09/2019	WNL	PD	Review correspondence re: settlement negotiations and analyze issues and alternatives.	0.20	895.00	\$179.00
01/16/2019	WNL	PD	Telephone call with A. Friedman re: settlement issues.	0.20	895.00	\$179.00
01/21/2019	WNL	PD	Telephone call with Alan Friedman re: preparation for confirmation hearing.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/21/2019	WNL	PD	Review correspondence re: preparation for confirmation hearing.	0.20	895.00	\$179.00
01/22/2019	WNL	PD	Review notice of continuance of confirmation hearing; telephone call with Alan Friedman re: same.	0.10	895.00	\$89.50
01/22/2019	TCF	PD	Review and analysis of plan confirmation preparation and telephone conference with A. Friedman regarding same.	0.50	695.00	\$347.50
01/22/2019	NPL	PD	Review notice of continued hearing on plan confirmation.	0.10	250.00	\$25.00
01/22/2019	NPL	PD	Prepare W. Lobel for meeting on plan confirmation.	1.20	250.00	\$300.00
01/23/2019	WNL	PD	Confer with Alan Friedman re: timing and settlement issues.	0.10	895.00	\$89.50
				12.20		\$8,418.00

Stay Litigation [B140]

01/15/2019	NPL	SL	Review and reply to email from A. Friedman regarding reply to contempt motion.	0.10	250.00	\$25.00
01/16/2019	TCF	SL	Attend to matters regarding contempt / violation of automatic stay and enforcement of rights.	0.80	695.00	\$556.00
				0.90		\$581.00

TOTAL SERVICES FOR THIS MATTER:

\$10,583.50

Pachulski Stang Ziehl & Jones LLP
Bral, John Jean
10601 00001

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Expenses

12/11/2018	GP	Guest Parking [E124] Parking for Bral Confirmation Hearing on 12/11/2018, WNL	20.00
12/14/2018	TR	Transcript [E116] Briggs Reporting for Bral Transcript of te Confirmation Hearing, WNL	51.60
01/14/2019	RE2	SCAN/COPY (161 @0.10 PER PG)	16.10
01/31/2019	PAC	Pacer - Court Research	0.60
Total Expenses for this Matter			\$88.30

Pachulski Stang Ziehl & Jones LLP
Bral, John Jean
10601 00001

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REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For current services rendered through 02/12/2019

Total Fees	\$10,583.50
Chargeable costs and disbursements	\$88.30
Total Due on Current Invoice.....	\$10,671.80

Outstanding Balance from prior Invoices as of 01/31/2019 **(May not reflect recent payments)**

Invoice Number	Invoice Date	Fees Billed	Expenses Billed	Balance Due
118521	01/31/2018	\$64,977.50	\$1.40	\$64,978.90
118768	02/28/2018	\$89,105.00	\$6,717.72	\$95,822.72
119267	03/31/2018	\$170,795.00	\$818.42	\$171,613.42
119338	04/30/2018	\$241,285.00	\$12,901.06	\$254,186.06
119732	06/13/2018	\$165,330.00	\$2,241.54	\$167,571.54
119915	06/30/2018	\$127,527.50	\$476.66	\$128,004.16
120454	07/31/2018	\$120,280.00	\$2,092.83	\$122,372.83
120456	08/31/2018	\$83,337.00	\$1,155.30	\$84,492.30
120968	11/30/2018	\$201,480.00	\$2,218.98	\$203,698.98
121257	01/30/2019	\$94,400.00	\$1,256.33	\$95,656.33
Total Amount Due on Current and Prior Invoices				\$1,399,069.04

Pachulski Stang Ziehl & Jones LLP

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

RE: Chapter 11

February 28, 2019
Invoice 121688
Client 10601
Matter 00001
WNL

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 02/28/2019

FEES	\$4,274.00
EXPENSES	\$121.50
TOTAL CURRENT CHARGES	\$4,395.50
BALANCE FORWARD	\$1,399,069.04
TOTAL BALANCE DUE	\$1,403,464.54

Pachulski Stang Ziehl & Jones LLP
Bral, John Jean
10601 -00001

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	0.20	\$179.00
CA	Case Administration [B110]	1.20	\$816.00
CO	Claims Admin/Objections[B310]	0.60	\$537.00
LN	Litigation (Non-Bankruptcy)	0.10	\$89.50
PD	Plan & Disclosure Stmt. [B320]	1.50	\$1,262.50
SL	Stay Litigation [B140]	2.00	\$1,390.00
		5.60	\$4,274.00

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	0.40	\$100.00
TCF	Flanagan, Tavi C.	Counsel	695.00	2.40	\$1,668.00
WNL	Lobel, William N.	Partner	895.00	2.80	\$2,506.00
				5.60	\$4,274.00

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Outside Services	\$120.00
Pacer - Court Research	\$1.50
	\$121.50

Pachulski Stang Ziehl & Jones LLP
 Bral, John Jean
 10601 -00001

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Hours Rate Amount

Asset Analysis/Recovery[B120]

02/20/2019	WNL	AA	Review complaint against Babak Samini.	0.20	895.00	\$179.00
				0.20		\$179.00

Case Administration [B110]

02/15/2019	WNL	CA	Review and revise January pre-bill.	0.60	895.00	\$537.00
02/15/2019	WNL	CA	Review Monthly Operating Report for January, 2019.	0.10	895.00	\$89.50
02/21/2019	WNL	CA	Review updated critical date summary.	0.10	895.00	\$89.50
02/22/2019	NPL	CA	Review and reply to email from L. Gauthier regarding updated critical date and deadline memorandum.	0.10	250.00	\$25.00
02/22/2019	NPL	CA	Attention to updating dates and deadlines pursuant to critical date and deadline memorandum.	0.30	250.00	\$75.00
				1.20		\$816.00

Claims Admin/Objections[B310]

02/18/2019	WNL	CO	Review correspondence re: Reply Brief re: Motion to Strike Claims.	0.20	895.00	\$179.00
02/25/2019	WNL	CO	Review correspondence re: alleged delinquency in payments to mortgage holder.	0.10	895.00	\$89.50
02/28/2019	WNL	CO	Review correspondence re: delinquent payments on mortgage.	0.10	895.00	\$89.50
02/28/2019	WNL	CO	Review correspondence and confer with Alan Friedman re: delinquency on second mortgage on Sandpiper property.	0.20	895.00	\$179.00

Pachulski Stang Ziehl & Jones LLP
 Bral, John Jean
 10601 -00001

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 February 28, 2019

0.60 **\$537.00**

Litigation (Non-Bankruptcy)

02/22/2019	WNL	LN	Review and respond to correspondence re: appellate argument.	0.10	895.00	\$89.50
				0.10		\$89.50

Plan & Disclosure Stmt. [B320]

02/13/2019	WNL	PD	Review correspondence re: settlement negotiations.	0.10	895.00	\$89.50
02/13/2019	TCF	PD	Review and analysis of plan and possible settlement issues.	0.20	695.00	\$139.00
02/19/2019	WNL	PD	Review correspondence re: settlement negotiations.	0.10	895.00	\$89.50
02/20/2019	WNL	PD	review correspondence re: settlement negotiations.	0.10	895.00	\$89.50
02/22/2019	WNL	PD	Telephone call with Alan Friedman re: status of settlement negotiations and related matters.	0.20	895.00	\$179.00
02/25/2019	TCF	PD	Review and analysis of plan confirmation issues; communications with A. Friedman regarding same.	0.20	695.00	\$139.00
02/27/2019	WNL	PD	Review correspondence re, and confer with A. Friedman, re: possible settlement proposal from Barry Beitler.	0.10	895.00	\$89.50
02/28/2019	WNL	PD	Review and analyze latest settlement proposal from Barry Beitler.	0.50	895.00	\$447.50
				1.50		\$1,262.50

Stay Litigation [B140]

02/13/2019	TCF	SL	Review and analysis of of contempt issues and reply thereto.	0.40	695.00	\$278.00
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				Hours	Rate	<u>Amount</u>
02/13/2019	TCF	SL	Telephone conference with A. Friedman regarding automatic stay violations / contempt issues and reply thereto.	0.20	695.00	\$139.00
02/25/2019	TCF	SL	Review and analysis of issues and research regarding contempt and stay violation reply; communications with A. Friedman regarding same.	0.20	695.00	\$139.00
02/28/2019	TCF	SL	Review and analysis of issues and research regarding contempt and stay violation reply.	1.20	695.00	\$834.00
TOTAL SERVICES FOR THIS MATTER:					2.00	\$1,390.00
						\$4,274.00

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Expenses

12/04/2018	OS	Case Anywhere, Inv. 146878, WNL	120.00
02/28/2019	PAC	Pacer - Court Research	1.50
Total Expenses for this Matter			\$121.50

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REMITTANCE ADVICE

Please include this Remittance Advice with your payment

For current services rendered through 02/28/2019

Total Fees	\$4,274.00
Chargeable costs and disbursements	\$121.50
Total Due on Current Invoice.....	\$4,395.50

Outstanding Balance from prior Invoices as of 02/28/2019 **(May not reflect recent payments)**

Invoice Number	Invoice Date	Fees Billed	Expenses Billed	Balance Due
118521	01/31/2018	\$64,977.50	\$1.40	\$64,978.90
118768	02/28/2018	\$89,105.00	\$6,717.72	\$95,822.72
119267	03/31/2018	\$170,795.00	\$818.42	\$171,613.42
119338	04/30/2018	\$241,285.00	\$12,901.06	\$254,186.06
119732	06/13/2018	\$165,330.00	\$2,241.54	\$167,571.54
119915	06/30/2018	\$127,527.50	\$476.66	\$128,004.16
120454	07/31/2018	\$120,280.00	\$2,092.83	\$122,372.83
120456	08/31/2018	\$83,337.00	\$1,155.30	\$84,492.30
120968	11/30/2018	\$201,480.00	\$2,218.98	\$203,698.98
121257	01/30/2019	\$94,400.00	\$1,256.33	\$95,656.33
121588	02/12/2019	\$10,583.50	\$88.30	\$10,671.80
Total Amount Due on Current and Prior Invoices				\$1,403,464.54

Pachulski Stang Ziehl & Jones LLP

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

April 30, 2019
Invoice 122286
Client 10601
Matter 00001
WNL

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 04/30/2019

FEES	\$108,840.50
EXPENSES	\$338.55
TOTAL CURRENT CHARGES	\$109,179.05
BALANCE FORWARD	\$1,403,464.54
TOTAL BALANCE DUE	\$1,512,643.59

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Summary of Services by Professional

ID	Name	Title	Rate	Hours	Amount
HDH	Hochman, Harry D.	Counsel	925.00	2.20	\$2,035.00
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	6.60	\$1,650.00
SAOS	O'Keefe, Sean A	Counsel	750.00	30.80	\$23,100.00
TCF	Flanagan, Tavi C.	Counsel	695.00	32.30	\$22,448.50
WNL	Lobel, William N.	Partner	895.00	66.60	\$59,607.00
				138.50	\$108,840.50

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	10.30	\$7,133.00
BO	Business Operations	5.50	\$4,988.50
CA	Case Administration [B110]	2.00	\$1,596.50
CO	Claims Admin/Objections[B310]	25.00	\$19,199.50
FC02	Stay Relief	0.10	\$25.00
LN	Litigation (Non-Bankruptcy)	2.20	\$1,969.00
PD	Plan & Disclosure Stmt. [B320]	72.00	\$60,434.00
SL	Stay Litigation [B140]	21.40	\$13,495.00
		138.50	\$108,840.50

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Lexis/Nexis- Legal Research [E	\$0.35
Outside Services	\$120.00
Pacer - Court Research	\$153.60
Reproduction/ Scan Copy	\$64.60
	<hr/>
	\$338.55

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bankruptcy Litigation [L430]						
03/06/2019	WNL	BL	Review correspondence and joint status reports in litigation matters.	0.20	895.00	\$179.00
03/06/2019	NPL	BL	Review and reply to email from A. Friedman regarding joint status reports for the Beitler adversary matters.	0.10	250.00	\$25.00
03/06/2019	NPL	BL	Prepare defendant portion of Joint Status Report regarding Barry Beitler v. Bral, forward same to W. Lobel for review.	0.30	250.00	\$75.00
03/06/2019	NPL	BL	Prepare defendant portion of Joint Status Report regarding Steward Financial v. Bral, forward same to W. Lobel for review.	0.30	250.00	\$75.00
03/06/2019	NPL	BL	Prepare defendant portion of Joint Status Report regarding Beitler & Associates v. Bral, forward same to W. Lobel for review.	0.30	250.00	\$75.00
03/06/2019	NPL	BL	Draft email to K. Meshefesian regarding joint status reports for Beitler adversary proceedings.	0.10	250.00	\$25.00
03/07/2019	NPL	BL	Review and reply to email from K. Meshefesian regarding Joint Status Reports for Beitler adversary matters.	0.10	250.00	\$25.00
03/21/2019	WNL	BL	Review correspondence re: responses to litigation claims.	0.20	895.00	\$179.00
03/21/2019	NPL	BL	Review and reply to email from A. Friedman regarding continued hearing on adversary matters.	0.10	250.00	\$25.00
03/26/2019	SAO	BL	Conference call with A. Friedman re preparation of updated motion to dismiss discharge complaint filed by Steward Financial.	0.30	750.00	\$225.00
03/31/2019	SAO	BL	Review Beitler's arguments re Steward Financial Claim and begin revising motion to dismiss discharge adversary based upon this claim.	1.90	750.00	\$1,425.00
04/16/2019	SAO	BL	Prepare motion to dismiss Steward Financial first amended complaint.	1.40	750.00	\$1,050.00
04/28/2019	SAO	BL	Revise motion to dismiss complaint filed by Steward Financial.	2.50	750.00	\$1,875.00
04/29/2019	SAO	BL	Continue revising updated motion to dismiss complaint filed by Steward Financial.	1.20	750.00	\$900.00
04/30/2019	SAO	BL	Revise and finalize motion to dismiss complaint	1.30	750.00	\$975.00

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		filed by Steward Financial.	<u>10.30</u>		<u>\$7,133.00</u>

Business Operations

03/05/2019	WNL	BO	Review correspondence re: potential distribution from Mission account.	0.10	895.00	\$89.50
03/15/2019	WNL	BO	Review correspondence re: use of distribution funds.	0.10	895.00	\$89.50
03/25/2019	WNL	BO	Review correspondence re: delinquent payments.	0.10	895.00	\$89.50
03/29/2019	WNL	BO	Review correspondence re: treatment of delinquent payments on mortgage.	0.10	895.00	\$89.50
03/29/2019	WNL	BO	Review correspondence re: delinquent payments.	0.10	895.00	\$89.50
04/15/2019	WNL	BO	Review correspondence re: financial issues and consider the implications of the issues and alternative courses of action.	0.20	895.00	\$179.00
04/15/2019	WNL	BO	Telephone call with Alan Friedman re: financial issues and responses thereto.	0.30	895.00	\$268.50
04/15/2019	WNL	BO	Review additional correspondence re: financial issues.	0.10	895.00	\$89.50
04/15/2019	WNL	BO	Telephone call with Alan Friedmann and John Bral re: financial issues.	0.40	895.00	\$358.00
04/15/2019	HDH	BO	Telephone conference with Lobel & Friedman re distribution and MOR	0.60	925.00	\$555.00
04/15/2019	HDH	BO	Review background pleadings	0.40	925.00	\$370.00
04/15/2019	WNL	BO	Review additional correspondence re: treatment of distribution from Mission.	0.10	895.00	\$89.50
04/16/2019	WNL	BO	Review correspondence re: return of distribution taken from Mission.	0.20	895.00	\$179.00
04/16/2019	HDH	BO	Review pleadings and research and drafting of rider re MOR	0.90	925.00	\$832.50
04/16/2019	HDH	BO	Correspond with counsel re MOR	0.30	925.00	\$277.50
04/16/2019	WNL	BO	Telephone call with Alan Friedman re: financial issues.	0.20	895.00	\$179.00
04/16/2019	WNL	BO	Second telephone call with Alan Friedman re: financial issues.	0.10	895.00	\$89.50
04/16/2019	WNL	BO	Telephone call with John Bral re: financial issues.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/16/2019	WNL	BO	Review correspondence re: financial issues.	0.20	895.00	\$179.00
04/16/2019	WNL	BO	Review additional correspondence re: financial issues.	0.20	895.00	\$179.00
04/16/2019	WNL	BO	Review proposed language re: language to be added to the Monthly Operating Report.	0.10	895.00	\$89.50
04/16/2019	WNL	BO	Review correspondence re: language to be added to Monthly Operating Report.	0.10	895.00	\$89.50
04/16/2019	WNL	BO	Review proposed language for Monthly Operating Report and related correspondence.	0.20	895.00	\$179.00
04/16/2019	WNL	BO	Review correspondence re: issues raised by distribution from Mission.	0.10	895.00	\$89.50
04/17/2019	WNL	BO	Review correspondence re: distribution from Mission.	0.10	895.00	\$89.50
04/18/2019	WNL	BO	Review correspondence re: questions concerning \$302,000 deposit into Debtor's bank account.	0.10	895.00	\$89.50
				5.50		\$4,988.50

Case Administration [B110]

03/06/2019	WNL	CA	Review and analyze new language added to Status Report by Beitler.	0.10	895.00	\$89.50
03/06/2019	WNL	CA	Review Joint Status Report..	0.10	895.00	\$89.50
03/07/2019	WNL	CA	Review Amended Joint Status Report.	0.10	895.00	\$89.50
03/18/2019	WNL	CA	Review Monthly Operating Report for February, 2019.	0.10	895.00	\$89.50
03/20/2019	WNL	CA	Review updated critical date summary.	0.10	895.00	\$89.50
03/20/2019	NPL	CA	Review and reply to email from L. Gauthier regarding critical date and deadline memorandum.	0.10	250.00	\$25.00
03/20/2019	NPL	CA	Attention to dates and deadlines associated with updated critical date and deadline memorandum.	0.20	250.00	\$50.00
03/21/2019	WNL	CA	Review correspondence re: status conferences.	0.10	895.00	\$89.50
04/03/2019	WNL	CA	Review updated critical dates summary.	0.10	895.00	\$89.50
04/17/2019	WNL	CA	Review correspondence re: Monthly Operating Report issues.	0.10	895.00	\$89.50
04/18/2019	WNL	CA	Review Monthly operating Report for March, 2019.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/18/2019	WNL	CA	Review correspondence re: review of Monthly Operating Report.	0.10	895.00	\$89.50
04/19/2019	WNL	CA	Review updated critical dates summary.	0.10	895.00	\$89.50
04/23/2019	WNL	CA	Review and analyze Status Conference Report.	0.60	895.00	\$537.00
				2.00		\$1,596.50

Claims Admin/Objections[B310]

03/01/2019	WNL	CO	Review correspondence re: Motion to Strike Claims.	0.10	895.00	\$89.50
03/01/2019	WNL	CO	Review correspondence re: pending hearings and timing issue.	0.10	895.00	\$89.50
03/05/2019	WNL	CO	Confer with A.. Friedman re: reversal of default judgment on appeal.	0.20	895.00	\$179.00
03/08/2019	WNL	CO	Review and respond to additional correspondence re: preparation for closing argument on Motion to Strike.	0.10	895.00	\$89.50
03/08/2019	WNL	CO	Telephone call with Alan friedman re: final argument in Motion to Strike and related issues.	0.20	895.00	\$179.00
03/08/2019	WNL	CO	Review correspondence re: preparation for hearing on Motion to Strike.	0.10	895.00	\$89.50
03/08/2019	WNL	CO	Review and respond to correspondence re: preparation for closing argument on Motion to Strike.	0.10	895.00	\$89.50
03/13/2019	WNL	CO	Review correspondence re: Reply Brief re: Motion to Strike Claims.	0.20	895.00	\$179.00
03/14/2019	SAO	CO	Review record and continue preparing closing argument re motion to strike record.	2.80	750.00	\$2,100.00
03/14/2019	SAO	CO	Review record re motion to strike claims and begin preparation of oral argument for closing presentation.	2.20	750.00	\$1,650.00
03/15/2019	SAO	CO	Continue preparing closing statement in motion to strike contested matter.	4.40	750.00	\$3,300.00
03/16/2019	SAO	CO	Draft and send out oral argument presentation for motion to strike claims.	3.20	750.00	\$2,400.00
03/16/2019	WNL	CO	Review correspondence re: oral argument on Motion To Strike Claims.	0.10	895.00	\$89.50
03/16/2019	WNL	CO	Review additional correspondence re: oral argument	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			on Motion To Strike.			
03/16/2019	WNL	CO	Review and analyze draft of argument to be made at hearing on Motion To Strike Claims.	0.80	895.00	\$716.00
03/18/2019	SAO	CO	Review record and continue finalizing oral argument re closing on motion to strike claims matter.	2.90	750.00	\$2,175.00
03/19/2019	SAO	CO	Attend hearing on closing argument re motion to strike proofs of claim.	4.00	750.00	\$3,000.00
03/19/2019	SAO	CO	Finalize and practice oral argument for 45 minute closing re motion to strike proofs of claim.	2.40	750.00	\$1,800.00
03/20/2019	WNL	CO	Review Petition for Rehearing filed by Barry Beitler.	0.20	895.00	\$179.00
03/27/2019	WNL	CO	Review and analyze transcript of hearing on Motion to Strike Claims.	0.30	895.00	\$268.50
04/15/2019	WNL	CO	Review correspondence re: treatment of Citi Bank claim.	0.20	895.00	\$179.00
04/16/2019	WNL	CO	Review correspondence re: treatment of claim of Citi Bank.	0.10	895.00	\$89.50
04/29/2019	WNL	CO	Review and analyze draft stipulation with CitiMortgage re: modification of mortgage and loan.	0.20	895.00	\$179.00
				25.00	\$19,199.50	

Stay Relief

03/15/2019	NPL	FC02	Review and reply to email from L. Gauthier regarding professional fees associated with the Relief from Stay Contempt Motion.	0.10	250.00	\$25.00
				0.10	\$25.00	

Litigation (Non-Bankruptcy)

03/06/2019	WNL	LN	Review correspondence re: Reply Brief re: Motion re: Violation of Stay.	0.20	895.00	\$179.00
03/06/2019	WNL	LN	Telephone call with A. Friedman re: Violation of Stay Reply and related issues.	0.20	895.00	\$179.00
03/06/2019	WNL	LN	Review and approve Joint Status Reports in various state court litigation.	0.20	895.00	\$179.00
03/06/2019	WNL	LN	Review draft of Reply to Response to Motion re: Violation of Stay.	0.50	895.00	\$447.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/08/2019	WNL	LN	Review latest status report in the Bral v. Beitler litigation.	0.10	895.00	\$89.50
03/12/2019	WNL	LN	Review status reports in pending state court litigation.	0.10	895.00	\$89.50
04/15/2019	WNL	LN	Review and analyze Petition for review filed by Beitler in Beitler v Bral litigation.	0.70	895.00	\$626.50
04/18/2019	WNL	LN	Review correspondence re: pending mediations.	0.10	895.00	\$89.50
04/22/2019	WNL	LN	Review correspondence re: status report in Bral v. Westcliff Investors.	0.10	895.00	\$89.50
				2.20	\$1,969.00	

Plan & Disclosure Stmt. [B320]

03/01/2019	WNL	PD	Review correspondence re:confirmation hearing.	0.10	895.00	\$89.50
03/01/2019	WNL	PD	Review correspondence re: pending hearings and timing issues.	0.10	895.00	\$89.50
03/01/2019	WNL	PD	Review correspondence re: preparation for confirmation hearing.	0.10	895.00	\$89.50
03/01/2019	WNL	PD	Review correspondence and analyze issues re: latest settlement proposal.	0.20	895.00	\$179.00
03/01/2019	WNL	PD	Analyze settlement proposal and financial consequences	0.20	895.00	\$179.00
03/04/2019	WNL	PD	Conference call with A. Friedman, T. Lallas and G. Klausner re: settlement issues and proposal.	1.00	895.00	\$895.00
03/04/2019	WNL	PD	Telephone call with Alan Friedman re: settlement negotiations and related issues.	0.20	895.00	\$179.00
03/04/2019	WNL	PD	Telephone call with Alan Friedman re: plan confirmation timing and related issues.	0.20	895.00	\$179.00
03/04/2019	WNL	PD	Telephone call with Alan Friedman and review and respond to correspondence re: confirmation date.	0.20	895.00	\$179.00
03/04/2019	WNL	PD	Review additional correspondence re: plan confirmation issues.	0.30	895.00	\$268.50
03/04/2019	WNL	PD	Review additional correspondence re: plan and timing issues.	0.20	895.00	\$179.00
03/04/2019	WNL	PD	Review and analyze correspondence re: timing and plan issues.	0.20	895.00	\$179.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/04/2019	WNL	PD	Review correspondence re: settlement strategy.	0.10	895.00	\$89.50
03/04/2019	WNL	PD	Review Beitler valuations of Bral interests in properties.	0.20	895.00	\$179.00
03/04/2019	WNL	PD	Review correspondence re: confirmation hearing.	0.10	895.00	\$89.50
03/04/2019	WNL	PD	Review correspondence re: settlement negotiations with Barry Beitler.	0.10	895.00	\$89.50
03/04/2019	WNL	PD	Review correspondence re: confirmation hearing.	0.10	895.00	\$89.50
03/04/2019	WNL	PD	Review, analyze and comment on revised settlement proposal.	0.30	895.00	\$268.50
03/04/2019	NPL	PD	Review email from A. Friedman regarding plan hearing dates and deadlines.	0.10	250.00	\$25.00
03/05/2019	WNL	PD	Review correspondence re: mistakes in financial calculations re: settlement proposal and related correspondence.	0.20	895.00	\$179.00
03/05/2019	WNL	PD	Telephone call with A. Friedman re: settlement options and strategy.	0.20	895.00	\$179.00
03/05/2019	WNL	PD	Review correspondence re: scheduling issues.	0.10	895.00	\$89.50
03/06/2019	WNL	PD	Review correspondence re: latest settlement proposal.	0.30	895.00	\$268.50
03/06/2019	WNL	PD	Review revisions to latest settlement proposal.	0.10	895.00	\$89.50
03/08/2019	WNL	PD	Review draft stipulation and order re: continuance of confirmation hearing.	0.10	895.00	\$89.50
03/08/2019	WNL	PD	Review and analyze issues re: settlement proposals.	0.20	895.00	\$179.00
03/08/2019	WNL	PD	Review correspondence re: continuance of additional hearings.	0.10	895.00	\$89.50
03/08/2019	WNL	PD	Telephone call with Alan Friedman re: settlement issues.	0.10	895.00	\$89.50
03/08/2019	WNL	PD	Review stipulation continuing confirmation hearing.	0.10	895.00	\$89.50
03/11/2019	WNL	PD	Attend meeting with John Bral and Alan Friedman re: response to latest Beitler settlement proposal.	1.40	895.00	\$1,253.00
03/11/2019	WNL	PD	Review stipulation to continue confirmation hearing.	0.10	895.00	\$89.50
03/12/2019	WNL	PD	Review and respond to correspondence re: continuance of confirmation hearing.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/12/2019	NPL	PD	Review and reply to multiple emails from L. Gauthier regarding Plan Confirmation Stipulation.	0.20	250.00	\$50.00
03/14/2019	WNL	PD	Review correspondence re: Avalon trust deed.	0.20	895.00	\$179.00
03/14/2019	WNL	PD	Review correspondence re: settlement issues.	0.20	895.00	\$179.00
03/14/2019	WNL	PD	Review and analyze correspondence re: settlement proposal and negotiations with Barry Beitler.	0.30	895.00	\$268.50
03/14/2019	WNL	PD	Review revised settlement proposal to Barry Beitler.	0.10	895.00	\$89.50
03/14/2019	WNL	PD	Review correspondence re: settlement negotiations with B. Beitler.	0.20	895.00	\$179.00
03/18/2019	WNL	PD	Telephone call with Alan Friedman re: settlement proposal and related issues.	0.20	895.00	\$179.00
03/18/2019	WNL	PD	Review and revise correspondence re: settlement proposal and proposed email to John Bral re: settlement issues.	0.40	895.00	\$358.00
03/18/2019	WNL	PD	Review and analyze revised email to John Bral re: settlement proposal.	0.20	895.00	\$179.00
03/18/2019	WNL	PD	Review revised email to John Bral re: settlement issues.	0.30	895.00	\$268.50
03/18/2019	WNL	PD	Review correspondence and telephone call with Alan Friedman re: revised email to John Bral re: settlement negotiations with Barry Beitler.	0.20	895.00	\$179.00
03/18/2019	WNL	PD	Review and analyze issues raised by final version of email to John Bral re: settlement negotiations and positions.	0.20	895.00	\$179.00
03/18/2019	WNL	PD	Review various correspondence re: settlement proposal.	0.30	895.00	\$268.50
03/18/2019	WNL	PD	Review and analyze draft revised settlement proposal and related correspondence.	0.30	895.00	\$268.50
03/18/2019	WNL	PD	Review correspondence re: proposal to be made to Barry Beitler.	0.10	895.00	\$89.50
03/19/2019	WNL	PD	Review and execute Stipulation to continue confirmation hearing.	0.10	895.00	\$89.50
03/20/2019	WNL	PD	Confer with Alan Friedman re: settlement negotiations with Barry Beitler.	0.20	895.00	\$179.00
03/21/2019	WNL	PD	Review correspondence re: settlement issues.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/22/2019	SAO	PD	Review motion to allow claims for voting purposes.	0.30	750.00	\$225.00
03/22/2019	WNL	PD	Review and analyze issues raised by revisions to latest draft of settlement agreement.	3.00	895.00	\$2,685.00
03/22/2019	WNL	PD	Review correspondence re: budgets to support disclosure statement.	0.30	895.00	\$268.50
03/25/2019	WNL	PD	Review and analyze proposed settlement proposal and alternatives.	0.60	895.00	\$537.00
03/25/2019	WNL	PD	Review proposed settlement offer.	0.20	895.00	\$179.00
03/26/2019	WNL	PD	Telephone call with Alan Friedman re: settlement issues.	0.20	895.00	\$179.00
03/26/2019	WNL	PD	Review and approve latest draft of proposed Settlement Agreement to Beitler.	0.20	895.00	\$179.00
03/26/2019	NPL	PD	Review entered order continuing plan confirmation and chapter 11 status conference.	0.10	250.00	\$25.00
03/26/2019	NPL	PD	Attention to dates and deadlines associated with continued plan confirmation hearing and chapter 11 status conference.	0.10	250.00	\$25.00
03/27/2019	WNL	PD	Review latest settlement proposal and related proposal and correspondence.	0.20	895.00	\$179.00
04/03/2019	TCF	PD	Review and analysis of confirmation issues.	0.40	695.00	\$278.00
04/04/2019	TCF	PD	Review and analysis of confirmation related issues and pocket brief on good faith.	0.60	695.00	\$417.00
04/10/2019	WNL	PD	Telephone call with Alan Friedman re: settlement negotiations and related issues.	0.20	895.00	\$179.00
04/10/2019	WNL	PD	Review correspondence re: settlement issues with Barry Beitler.	0.10	895.00	\$89.50
04/13/2019	TCF	PD	Review and analysis of confirmation issues.	0.20	695.00	\$139.00
04/14/2019	TCF	PD	Review and analysis of confirmation issues.	0.10	695.00	\$69.50
04/15/2019	WNL	PD	Telephone call with H. Hochman and A. Friedman re: disclosure of financial issues.	0.70	895.00	\$626.50
04/15/2019	WNL	PD	Review correspondence re: preparation for confirmation hearing.	0.10	895.00	\$89.50
04/15/2019	WNL	PD	Review correspondence re: Mission distribution and Plan confirmation.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/15/2019	WNL	PD	Review and analyze arguments in debtor's Reply to Beitler's Opposition to Motion for Summary Judgment.	0.30	895.00	\$268.50
04/15/2019	TCF	PD	Review and analysis of issues regarding plan confirmation; research and review; various correspondence with respect thereto.	2.40	695.00	\$1,668.00
04/16/2019	WNL	PD	Review correspondence re: financial issues.	0.30	895.00	\$268.50
04/16/2019	WNL	PD	Review correspondence re: confirmation issues.	0.30	895.00	\$268.50
04/16/2019	WNL	PD	Review additional correspondence re: confirmation issues.	0.20	895.00	\$179.00
04/16/2019	WNL	PD	Review and analyze additional correspondence re: effect of Mission distribution on plan confirmation.	0.20	895.00	\$179.00
04/16/2019	WNL	PD	Review correspondence re: Citi Bank claim and confirmation issues.	0.10	895.00	\$89.50
04/16/2019	TCF	PD	Review and analysis of confirmation related issues.	0.80	695.00	\$556.00
04/17/2019	WNL	PD	Review correspondence re: preparation for confirmation hearing.	0.10	895.00	\$89.50
04/17/2019	TCF	PD	Review and analysis of confirmation issues.	1.20	695.00	\$834.00
04/18/2019	TCF	PD	Preparation for confirmation.	1.40	695.00	\$973.00
04/18/2019	TCF	PD	Research and analysis regarding good faith (1129(a)(3) issues).	1.60	695.00	\$1,112.00
04/19/2019	TCF	PD	Draft brief re 1129(a)(3).	5.60	695.00	\$3,892.00
04/19/2019	WNL	PD	Telephone call with Alan Friedman re: confirmation issues.	0.10	895.00	\$89.50
04/19/2019	TCF	PD	Review and analysis of confirmation issues and preparation.	1.20	695.00	\$834.00
04/20/2019	WNL	PD	Review summary of Alan Friedman conversation with John Bral.	0.20	895.00	\$179.00
04/20/2019	WNL	PD	Preparation for Confirmation Hearing.	1.60	895.00	\$1,432.00
04/20/2019	WNL	PD	Review and analyze outline to assist on preparation for confirmation hearing.	1.60	895.00	\$1,432.00
04/20/2019	WNL	PD	Review and analyze pocket brief on good faith issue.	0.20	895.00	\$179.00
04/22/2019	WNL	PD	Telephone call with Alan Friedman re: preparation for confirmation hearing.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/23/2019	TCF	PD	Attend to confirmation related issues.	0.50	695.00	\$347.50
04/24/2019	WNL	PD	Confer with Alan Friedman re: plan confirmation issues.	0.30	895.00	\$268.50
04/24/2019	WNL	PD	Review correspondnce re: subpoena of documents for confirmation hearing and telephone call with Alan Friedman re: same.	0.10	895.00	\$89.50
04/24/2019	WNL	PD	Review correspondence re: documents that are responsive to the subpoena.	0.10	895.00	\$89.50
04/24/2019	WNL	PD	Telephone call with Alan Friedman re: preparation for plan confirmation.	0.40	895.00	\$358.00
04/24/2019	WNL	PD	Telephone call with Tavi Flanagan re: plan confirmation issues.	0.10	895.00	\$89.50
04/24/2019	WNL	PD	Confer with J. Bral, A. Friedman and G. Pemberton to prepare for confirmation hearing.	1.60	895.00	\$1,432.00
04/24/2019	TCF	PD	Attend to confirmation issues and preparation.	0.80	695.00	\$556.00
04/25/2019	WNL	PD	Telephone call with Alan Friedman re: preparation for plan confirmation hearing.	0.10	895.00	\$89.50
04/26/2019	WNL	PD	Telephone call with Alan Friedman re: plan confirmation and settlement.	0.30	895.00	\$268.50
04/26/2019	WNL	PD	Telephone call with Alan Friedman re: preparation for confirmation hearing.	0.30	895.00	\$268.50
04/26/2019	WNL	PD	Review correspondence re: settlement proposal to Barry Beitler.	0.10	895.00	\$89.50
04/26/2019	WNL	PD	Review comments to proposed settlement agreement.	0.10	895.00	\$89.50
04/26/2019	WNL	PD	Review correspondence re: Citibank issues.	0.10	895.00	\$89.50
04/26/2019	WNL	PD	Review correspondence re:responses to discovery requests.	0.10	895.00	\$89.50
04/26/2019	WNL	PD	Review Confirmation Hearing Nores/Outline, Briefs re: 1129(a)(3) and (a) (5) and transcript of December 11,2018 hearing.	2.80	895.00	\$2,506.00
04/27/2019	WNL	PD	Confer with Alan Friedman re: preparation for confirmation hearing.	2.50	895.00	\$2,237.50
04/27/2019	WNL	PD	Telephone calls with John Bral re: settlement proposal to Barry Beitler.	0.20	895.00	\$179.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/27/2019	WNL	PD	Review and approve settlement proposal to Barry Beitler.	0.10	895.00	\$89.50
04/27/2019	WNL	PD	Telephone call with Alan Friedman re: settlement proposal to Barry Beitler.	0.10	895.00	\$89.50
04/28/2019	WNL	PD	Prepare for confirmation hearing.	3.60	895.00	\$3,222.00
04/28/2019	WNL	PD	Review and analyze transcript of hearing held on November 16,2018.	0.80	895.00	\$716.00
04/28/2019	WNL	PD	Review and analyze confirmation brief and related pleadings.	2.50	895.00	\$2,237.50
04/29/2019	WNL	PD	Review Debtor's Objections to Items Sobpoenaed.	0.20	895.00	\$179.00
04/29/2019	WNL	PD	Telephone call with Alan Friedman re: preparation for confirmation hearing.	0.20	895.00	\$179.00
04/29/2019	WNL	PD	Review documents to be produced pursuant to subpoena.	0.10	895.00	\$89.50
04/29/2019	WNL	PD	Review and consider responses to Notice to Request Continuance of Confirmation Hearing.	0.20	895.00	\$179.00
04/29/2019	WNL	PD	Continue preparation for confirmation hearing, including drafting of outline of oral argument.	4.80	895.00	\$4,296.00
04/29/2019	WNL	PD	Review correspondence re: inquiries from Barry Beitler re: various issues and items.	0.20	895.00	\$179.00
04/29/2019	TCF	PD	Review and analysis of confirmation issues; prepare for confirmation hearing; telephone conference with W. Lobel regarding same.	0.50	695.00	\$347.50
04/30/2019	WNL	PD	Continue preparation for confirmation hearing.	1.80	895.00	\$1,611.00
04/30/2019	WNL	PD	Confer with Alan Friedmnan re:preparation for confirmation hearing.	1.50	895.00	\$1,342.50
04/30/2019	WNL	PD	Attendance at confirmation hearing and settlement conferences during the day.	5.70	895.00	\$5,101.50
04/30/2019	WNL	PD	Telephone call with Nancy Lockwood re: terms of settlement, effect on scheduled hearings and remaining action to take place.	0.20	895.00	\$179.00
04/30/2019	TCF	PD	Prepare for confirmation hearing; various communications with team regarding same.	0.40	695.00	\$278.00
04/30/2019	TCF	PD	Confirmation hearing; potential settlement; various communications with team regarding same.	0.50	695.00	\$347.50

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				72.00		\$60,434.00
Stay Litigation [B140]						
03/01/2019	WNL	SL	Review correspondence re: hearing on sanctions motion.	0.10	895.00	\$89.50
03/01/2019	TCF	SL	Draft and revise reply, and research regarding contempt and stay violation reply.	5.20	695.00	\$3,614.00
03/01/2019	TCF	SL	Revisions to contempt reply and declaration in support.	0.80	695.00	\$556.00
03/04/2019	TCF	SL	Review and analysis of stay litigation matters and contempt hearing.	0.10	695.00	\$69.50
03/05/2019	NPL	SL	Review and reply to email from L. Gauthier regarding Bral's reply to opposition to Contempt Motion regarding relief from stay.	0.10	250.00	\$25.00
03/06/2019	WNL	SL	Review correspondence re: Reply in Motion for Contempt.	0.30	895.00	\$268.50
03/06/2019	NPL	SL	Review and reply to email from L. Gauthier regarding Reply to Opposition to Contempt Motion.	0.10	250.00	\$25.00
03/06/2019	NPL	SL	Confer with W. Lobel regarding review and revisions to Reply to Opposition to Contempt Motion.	0.10	250.00	\$25.00
03/06/2019	NPL	SL	Review Reply to Opposition to Contempt Motion for consistency and accuracy.	0.30	250.00	\$75.00
03/13/2019	WNL	SL	Telephone call with Alan Friedman re: results of hearing on Motion re: violation of stay.	0.20	895.00	\$179.00
03/15/2019	WNL	SL	Review and analyze transcript of hearing on Motion for Contempt re: Stay Violation.	0.40	895.00	\$358.00
03/25/2019	TCF	SL	Review and analysis of issues regarding contempt motion and professional fees incurred in connection therewith.	0.10	695.00	\$69.50
03/25/2019	TCF	SL	Correspondence with N. Lockwood regarding contempt motion and professional fees incurred in connection therewith.	0.10	695.00	\$69.50
03/25/2019	TCF	SL	Review declaration in support of professional fees incurred in connection with contempt proceedings; correspondence with W. Lobel regarding same.	0.10	695.00	\$69.50
03/25/2019	WNL	SL	Review correspondence re: amount of fees incurred in dealing with the violation of stay.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/25/2019	WNL	SL	Review draft declaration of William Lobel re: fees incurred as a result of Beitler's violation of stay, entries on timesheets and related correspondence.	0.20	895.00	\$179.00
03/25/2019	NPL	SL	Review and analysis of fees related to the violation of automatic stay contempt motion.	1.90	250.00	\$475.00
03/25/2019	NPL	SL	Prepare declaration of W. Lobel regarding declaration of William N. Lobel in support of fees related to contempt motion.	0.80	250.00	\$200.00
03/25/2019	NPL	SL	Prepare summary of professional fees related contempt motion.	0.30	250.00	\$75.00
03/25/2019	NPL	SL	Review and reply to email from L. Gauthier regarding professional fees related to contempt motion.	0.10	250.00	\$25.00
03/25/2019	NPL	SL	Draft email to T. Flanagan and W. Lobel regarding declaration of W. Lobel in support of professional fees related to contempt motion.	0.10	250.00	\$25.00
03/25/2019	NPL	SL	Review and reply to email from T. Flanagan regarding professional fees related to contempt motion.	0.10	250.00	\$25.00
03/25/2019	NPL	SL	Office conference with W. Lobel regarding declaration in support of professional fees related to contempt motion.	0.10	250.00	\$25.00
03/27/2019	WNL	SL	Review and approve draft declaration of Wiliam Lobel in support of fees incurred in connection with violation of stay motion and supporting time charges.	0.20	895.00	\$179.00
03/27/2019	WNL	SL	Review declaration of Alan Friedman re: fees incurred by Shulman firm.	0.10	895.00	\$89.50
03/27/2019	NPL	SL	Review and reply to email from L. Gauthier regarding professional fees associated with Contempt Motion.	0.10	250.00	\$25.00
03/27/2019	NPL	SL	Revise and finalize declaration of W. Lobel regarding professional fees incurred relating to Contempt Motion.	0.30	250.00	\$75.00
04/05/2019	WNL	SL	Review correspondence re: Motion for Sanctions.	0.20	895.00	\$179.00
04/06/2019	TCF	SL	Review and analysis of stay litigation issues; Telephone conference with A. Friedman regarding same.	0.50	695.00	\$347.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/07/2019	TCF	SL	Review and analysis of contempt issues.	0.20	695.00	\$139.00
04/09/2019	WNL	SL	Review and analyze Beitler Response to Motion for Sanctions.	0.30	895.00	\$268.50
04/09/2019	TCF	SL	Draft reply to opposition to Beitler's response to fees for violation of automatic stay; research and analysis with respect thereto.	6.80	695.00	\$4,726.00
04/10/2019	WNL	SL	Review comments to draft Reply re: Sanctions Motion.	0.10	895.00	\$89.50
04/10/2019	TCF	SL	Review and analysis of automatic stay / contempt issues; correspondence with A. Friedman regarding same.	0.20	695.00	\$139.00
04/11/2019	WNL	SL	Review and comment on draft Reply to Barry Beitler's Response re: Violation of Automatic Stay.	0.30	895.00	\$268.50
04/12/2019	WNL	SL	Review and analyze Debtor's Reply to Beitler Response re: Sanctions Motion.	0.40	895.00	\$358.00
				21.40	\$13,495.00	
TOTAL SERVICES FOR THIS MATTER:				\$108,840.50		

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Expenses

03/05/2019	RE2	SCAN/COPY (22 @0.10 PER PG)	2.20
03/06/2019	OS	Case Anywhere, Inv. 153718, WNL	120.00
04/23/2019	RE2	SCAN/COPY (15 @0.10 PER PG)	1.50
04/26/2019	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
04/26/2019	RE2	SCAN/COPY (34 @0.10 PER PG)	3.40
04/26/2019	RE2	SCAN/COPY (65 @0.10 PER PG)	6.50
04/26/2019	RE2	SCAN/COPY (212 @0.10 PER PG)	21.20
04/26/2019	RE2	SCAN/COPY (32 @0.10 PER PG)	3.20
04/26/2019	RE2	SCAN/COPY (95 @0.10 PER PG)	9.50
04/26/2019	RE2	SCAN/COPY (34 @0.10 PER PG)	3.40
04/26/2019	RE2	SCAN/COPY (4 @0.10 PER PG)	0.40
04/29/2019	LN	10601.00001 Lexis Charges for 04-29-19	0.35
04/29/2019	RE2	SCAN/COPY (33 @0.10 PER PG)	3.30
04/29/2019	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
04/29/2019	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
04/29/2019	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
04/29/2019	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
04/29/2019	RE2	SCAN/COPY (12 @0.10 PER PG)	1.20
04/29/2019	RE2	SCAN/COPY (14 @0.10 PER PG)	1.40
04/30/2019	PAC	Pacer - Court Research	153.60
Total Expenses for this Matter			\$338.55

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REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 04/30/2019

Total Fees	\$108,840.50
Total Expenses	338.55
Total Due on Current Invoice	\$109,179.05

Outstanding Balance from prior invoices as of 04/30/2019		(May not include recent payments)	
A/R Bill Number	Invoice Date	Fees Billed	Expenses Billed
118521	01/31/2018	\$64,977.50	\$1.40
118768	02/28/2018	\$89,105.00	\$6,717.72
119267	03/31/2018	\$170,795.00	\$818.42
119338	04/30/2018	\$241,285.00	\$12,901.06
119732	06/13/2018	\$165,330.00	\$2,241.54
119915	06/30/2018	\$127,527.50	\$476.66
120454	07/31/2018	\$120,280.00	\$2,092.83
120456	08/31/2018	\$83,337.00	\$1,155.30
120968	11/30/2018	\$201,480.00	\$2,218.98
121257	01/30/2019	\$94,400.00	\$1,256.33
121588	02/12/2019	\$10,583.50	\$88.30
121688	02/28/2019	\$4,274.00	\$121.50
Total Amount Due on Current and Prior Invoices:		\$1,512,643.59	

Pachulski Stang Ziehl & Jones LLP

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

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Client 10601
Matter 00001
WNL

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2019

FEES	\$45,694.00
EXPENSES	\$1,023.84
TOTAL CURRENT CHARGES	\$46,717.84
BALANCE FORWARD	\$1,512,643.59
TOTAL BALANCE DUE	\$1,559,361.43

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Summary of Services by Professional

ID	Name	Title	Rate	Hours	Amount
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	5.80	\$1,450.00
SAOS	O'Keefe, Sean A	Counsel	750.00	9.50	\$7,125.00
TCF	Flanagan, Tavi C.	Counsel	695.00	30.10	\$20,919.50
WNL	Lobel, William N.	Partner	895.00	18.10	\$16,199.50
			63.50		\$45,694.00

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	1.50	\$1,125.00
BO	Business Operations	13.50	\$8,857.00
CA	Case Administration [B110]	2.30	\$1,349.00
CO	Claims Admin/Objections[B310]	9.40	\$6,910.50
EMP	Employment of Professionals	0.30	\$75.00
LN	Litigation (Non-Bankruptcy)	2.00	\$1,379.00
PD	Plan & Disclosure Stmt. [B320]	34.30	\$25,948.50
SL	Stay Litigation [B140]	0.20	\$50.00
		63.50	\$45,694.00

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Auto Travel Expense [E109]	\$20.00
Working Meals [E111]	\$149.34
Filing Fee [E112]	\$714.15
Lexis/Nexis- Legal Research [E	\$124.25
Pacer - Court Research	\$3.60
Postage [E108]	\$2.60
Reproduction/ Scan Copy	\$9.90
	<hr/>
	\$1,023.84

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bankruptcy Litigation [L430]						
05/02/2019	SAO	BL	Research re estoppel effect of not seeking fees in dismissal of Ocean View Bankruptcy re objection to Steward proof of claim.	1.50	750.00	\$1,125.00
				<u>1.50</u>		<u>\$1,125.00</u>

Business Operations

05/02/2019	WNL	BO	Review correspondence re: Cannae distribution.	0.10	895.00	\$89.50
05/02/2019	WNL	BO	Review correspondence re: distributions from Mission.	0.10	895.00	\$89.50
05/08/2019	TCF	BO	Review and analysis of use of Mission funds; request for approval of same.	1.40	695.00	\$973.00
05/08/2019	NPL	BO	Review and reply to email from T. Flanagan regarding 363 motion regarding living expenses.	0.20	250.00	\$50.00
05/08/2019	NPL	BO	Research issues related to use of estate funds for living expenses.	0.60	250.00	\$150.00
05/13/2019	TCF	BO	Research and draft motion to use Mission funds to pay living expenses.	6.80	695.00	\$4,726.00
05/15/2019	NPL	BO	Review and reply to email from T. Flanagan regarding motion for use of property of the estate.	0.10	250.00	\$25.00
05/15/2019	TCF	BO	Communications with A. Friedman regarding 363 motion.	0.10	695.00	\$69.50
05/15/2019	TCF	BO	Attend to preparation of 363 motion (Mission funds).	0.40	695.00	\$278.00
05/16/2019	NPL	BO	Review and reply to email from T. Flanagan regarding motion for use of property of the estate.	0.10	250.00	\$25.00
05/16/2019	NPL	BO	Prepare declaration of J. Bral regarding motion for use of property of the estate.	0.80	250.00	\$200.00
05/16/2019	NPL	BO	Draft email to T. Flanagan regarding declaration of J. Bral regarding motion for use of property of the estate.	0.10	250.00	\$25.00
05/16/2019	TCF	BO	Correspondence with N. Lockwood regarding 363 motion to use property of the estate; declaration in support and budget.	0.10	695.00	\$69.50
05/16/2019	TCF	BO	Correspondence with J. Bral regarding budget.	0.10	695.00	\$69.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/20/2019	WNL	BO	Review correspondence re: renewal of Dr. Alder lease.	0.10	895.00	\$89.50
05/20/2019	TCF	BO	Communications with N. Lockwood regarding motion to use estate funds.	0.10	695.00	\$69.50
05/20/2019	TCF	BO	Review and revise 363 use of estate funds motion.	0.50	695.00	\$347.50
05/20/2019	TCF	BO	Attend to matters regarding use of estate funds motion.	0.30	695.00	\$208.50
05/20/2019	TCF	BO	Various communications with team regarding motion to use estate funds.	0.20	695.00	\$139.00
05/21/2019	WNL	BO	Review and analyze issues re: Motion For Order Authorizing John Bral to Use Property of the Estate.	0.40	895.00	\$358.00
05/21/2019	WNL	BO	Review Motion To Use Property of the Estate for Living Expenses.	0.60	895.00	\$537.00
05/21/2019	WNL	BO	Review correspondence re: treatment of Dr. Adler (tenant).	0.10	895.00	\$89.50
05/22/2019	WNL	BO	Review correspondence re: use of estate funds for living expenses.	0.20	895.00	\$179.00
				13.50	\$8,857.00	

Case Administration [B110]

04/02/2019	NPL	CA	Review and analysis of time entries for professionals.	0.30	250.00	\$75.00
04/03/2019	NPL	CA	Review and reply to email from L. Gauthier regarding critical dates and deadlines.	0.10	250.00	\$25.00
04/23/2019	NPL	CA	Review and reply to email from L. Gauthier regarding chapter 11 status report.	0.10	250.00	\$25.00
05/02/2019	WNL	CA	Review updated critical dates summary.	0.10	895.00	\$89.50
05/02/2019	WNL	CA	Review correspondence re: status conference.	0.10	895.00	\$89.50
05/02/2019	NPL	CA	Attention to outstanding dates and deadlines regarding confirmation, adversaries and contested matters.	0.30	250.00	\$75.00
05/16/2019	NPL	CA	Attention to outstanding dates, deadlines and task list.	0.20	250.00	\$50.00
05/16/2019	NPL	CA	Review and reply to email from L. Gauthier regarding outstanding dates and deadlines.	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/23/2019	WNL	CA	Review correspondence re: complaint fee.	0.10	895.00	\$89.50
05/25/2019	WNL	CA	Review and revise pre-bill for March and April.	0.90	895.00	\$805.50
					2.30	\$1,349.00

Claims Admin/Objections[B310]

05/01/2019	WNL	CO	Review correspondence re: treatment of John Bral's distributions from Mission.	0.10	895.00	\$89.50
05/02/2019	SAO	CO	Conference call with A. Friedman re objection to Steward Financial proof of claim.	0.20	750.00	\$150.00
05/03/2019	SAO	CO	Prepare insert to objection to Steward proof of claim re preclusive effect of dismissal order.	1.30	750.00	\$975.00
05/06/2019	SAO	CO	Prepare insert to objection to Steward Financial proof of claim re procedural bar against damages.	1.50	750.00	\$1,125.00
05/07/2019	SAO	CO	Prepare insert to objection to Steward Financial claim 19 re preclusion argument.	2.40	750.00	\$1,800.00
05/09/2019	SAO	CO	Review and revise objection to Proof of Claim 19.	1.10	750.00	\$825.00
05/14/2019	TCF	CO	Communications with A. Friedman regarding Mission funds motion.	0.20	695.00	\$139.00
05/14/2019	TCF	CO	Review and revise motion to use funds to pay living expenses.	1.40	695.00	\$973.00
05/20/2019	TCF	CO	Review and revise motion to use estate funds.	0.60	695.00	\$417.00
05/21/2019	TCF	CO	Continues review and revision 363 motion.	0.60	695.00	\$417.00
					9.40	\$6,910.50

Employment of Professionals

05/10/2019	NPL	EMP	Review and reply to email from T. Flanagan regarding professional fees for Bral.	0.10	250.00	\$25.00
05/10/2019	NPL	EMP	Confer with J. O'Keefe regarding professional fees.	0.20	250.00	\$50.00
					0.30	\$75.00

Litigation (Non-Bankruptcy)

04/22/2019	NPL	LN	Review and reply to email from L. Gauthier regarding status report in Bral v. Westcliff state court action.	0.10	250.00	\$25.00
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/23/2019	NPL	LN	Finalize status report for state court litigation regarding Bral v. Westcliff.	0.20	250.00	\$50.00
05/08/2019	SAO	LN	Attend bankruptcy status conference in Bral v. Westcliff.	1.00	750.00	\$750.00
05/13/2019	WNL	LN	Review correspondence re: Westcliff arbitration.	0.10	895.00	\$89.50
05/23/2019	WNL	LN	Review correspondence re: Court Costs.	0.10	895.00	\$89.50
05/31/2019	SAO	LN	Final review of motion to dismiss Steward non-dischargeability complaint.	0.50	750.00	\$375.00
				2.00	\$1,379.00	

Plan & Disclosure Stmt. [B320]

04/26/2019	NPL	PD	Telephone call with W. Lobel regarding confirmation preparation.	0.10	250.00	\$25.00
04/26/2019	NPL	PD	Prepare W. Lobel for confirmation hearing.	1.10	250.00	\$275.00
04/29/2019	NPL	PD	Office conference with W. Lobel regarding claims classification.	0.10	250.00	\$25.00
04/29/2019	NPL	PD	Prepare W. Lobel for confirmation hearing.	0.40	250.00	\$100.00
04/29/2019	NPL	PD	Review notice requesting continuance of confirmation hearing.	0.20	250.00	\$50.00
05/01/2019	WNL	PD	Telephone call with Tavi Flanagan re: terms of settlement and related issues.	0.20	895.00	\$179.00
05/01/2019	WNL	PD	Telephone call with Alan Friedman re: remaining issues after settlement.	0.30	895.00	\$268.50
05/01/2019	WNL	PD	Second call with Alan Friedman re: remaining settlement issues and action to be taken.	0.30	895.00	\$268.50
05/01/2019	WNL	PD	Review request for information needed for Barry Beitler to finance the payments he will make on the Effective Date.	0.10	895.00	\$89.50
05/01/2019	TCF	PD	Review and analysis of confirmation issues; settlement; communications with team regarding same.	1.40	695.00	\$973.00
05/02/2019	WNL	PD	Telephone call with Alan Friedman re: settlement issues.	0.30	895.00	\$268.50
05/02/2019	WNL	PD	Review correspondence re: list of liquidated claims of Barry Beitler.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/02/2019	TCF	PD	Review and analysis of Citibank treatment and settlement; review and analysis of correspondence with respect thereto.	0.10	695.00	\$69.50
05/02/2019	TCF	PD	Review and analysis of confirmation related issues and modification of plan per settlement; motion for non-material modifications.	1.00	695.00	\$695.00
05/03/2019	WNL	PD	Telephone call with John Bral re: settlement issues.	0.30	895.00	\$268.50
05/03/2019	WNL	PD	Telephone call with Alan Friedman re: settlement issues and modification of the plan.	0.20	895.00	\$179.00
05/03/2019	WNL	PD	Review correspondence re: issues concerning specific terms of the plan.	0.20	895.00	\$179.00
05/03/2019	WNL	PD	Review correspondence re: additional information requests made by Barry Beitler.	0.10	895.00	\$89.50
05/03/2019	TCF	PD	Review and analysis of settlement issues and terms; implementation of same.	0.50	695.00	\$347.50
05/06/2019	WNL	PD	Review correspondence re: pending action to be taken.	0.10	895.00	\$89.50
05/06/2019	WNL	PD	Review and forward article re: timing of measurement of proposing a plan in good faith.	0.10	895.00	\$89.50
05/06/2019	WNL	PD	Review correspondence re: revised treatment of Citibank claim.	0.10	895.00	\$89.50
05/07/2019	WNL	PD	Review and analyze red lined Third Amended Plan and related correspondence.	0.70	895.00	\$626.50
05/08/2019	TCF	PD	Review and analysis of plan issues and negotiations / modifications; request for approval of same.	0.60	695.00	\$417.00
05/09/2019	TCF	PD	Review and analysis of plan and modifications.	1.00	695.00	\$695.00
05/10/2019	WNL	PD	Review revised draft of Third Amended Plan, including G. Pemberton's comments.	0.40	895.00	\$358.00
05/10/2019	WNL	PD	Telephone conference with A. Friedman and T. Flanagan regarding settlement issues.	1.00	895.00	\$895.00
05/10/2019	WNL	PD	Review proposed revisions to the Third Amended Plan.	0.30	895.00	\$268.50
05/11/2019	TCF	PD	Review and analysis of plan modifications and open issues.	0.60	695.00	\$417.00
05/13/2019	WNL	PD	Review and analyze transcript of April 30 hearing	0.90	895.00	\$805.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			on Plan confirmation.			
05/13/2019	WNL	PD	Review and analyze transcript of continued confirmation hearing.	0.70	895.00	\$626.50
05/13/2019	WNL	PD	Review correspondence re: revisions to Third Amended Plan.	0.30	895.00	\$268.50
05/14/2019	WNL	PD	Review correspondence re: settlement issues and need to clarify terms of settlement proposal.	0.30	895.00	\$268.50
05/14/2019	WNL	PD	Review correspondence re: issues with the structure of the proposed plan treatment of LLC dissolutions.	0.10	895.00	\$89.50
05/14/2019	WNL	PD	Draft correspondence re: new issue in settlement with Beitler.	0.10	895.00	\$89.50
05/14/2019	WNL	PD	Review and analyze changes in Third Amended Plan.	1.30	895.00	\$1,163.50
05/14/2019	TCF	PD	Attention to plan and confirmation issues.	1.20	695.00	\$834.00
05/15/2019	WNL	PD	Review correspondence re: settlement negotiations with Barry Beitler.	0.10	895.00	\$89.50
05/15/2019	TCF	PD	Review and analysis of plan modifications.	0.20	695.00	\$139.00
05/15/2019	TCF	PD	Correspondence with L. Gauthier regarding motion to approve plan modifications.	0.10	695.00	\$69.50
05/16/2019	WNL	PD	Telephone call with Alan Friedman re: settlement issues and conversation with Gary Klausner.	0.30	895.00	\$268.50
05/16/2019	TCF	PD	Draft motion for non-material modifications of plan.	5.60	695.00	\$3,892.00
05/17/2019	TCF	PD	Research, review and revisions to plan motion.	1.20	695.00	\$834.00
05/17/2019	TCF	PD	Correspondence with A. Friedman regarding plan motion.	0.10	695.00	\$69.50
05/17/2019	TCF	PD	Review and analysis of plan negotiations.	0.20	695.00	\$139.00
05/19/2019	TCF	PD	Correspondence with N. Lockwood regarding plan modification motion.	0.10	695.00	\$69.50
05/20/2019	WNL	PD	Conference call with Gary Klausner and Tom Lallas re: remaining issues re: terms of Plan.	0.40	895.00	\$358.00
05/20/2019	WNL	PD	Review correspondence re: negotiations with Barry Beitler.	0.10	895.00	\$89.50
05/20/2019	WNL	PD	Review correspondence re: negotiations with Barry Beitler.	0.20	895.00	\$179.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/20/2019	WNL	PD	Telephone call with Gary Klausner and Tom Lallas re: settlement of pending issues.	0.40	895.00	\$358.00
05/20/2019	TCF	PD	Review and revise plan modification motion.	0.40	695.00	\$278.00
05/20/2019	TCF	PD	Correspondence with N. Lockwood regarding plan modification motion.	0.10	695.00	\$69.50
05/20/2019	TCF	PD	Review and revise plan modification motion.	0.50	695.00	\$347.50
05/20/2019	TCF	PD	Attend to matters regarding motion to approve plan modifications.	0.30	695.00	\$208.50
05/20/2019	TCF	PD	Various correspondence with team regarding motion to approve plan modifications.	0.20	695.00	\$139.00
05/20/2019	TCF	PD	Review and revise plan modification motion.	0.60	695.00	\$417.00
05/20/2019	TCF	PD	Attend to matters regarding CitiMortgage Stipulation; correspondence with respect thereto.	0.20	695.00	\$139.00
05/21/2019	WNL	PD	Review correspondence re: negotiations with Gary Klausner.	0.20	895.00	\$179.00
05/21/2019	WNL	PD	Telephone call with Alan Friedman re: settlement issues and conversation with Gary Klausner and Tom Lallas.	0.50	895.00	\$447.50
05/21/2019	WNL	PD	Review correspondence re: continuation of settlement negotiations.	0.10	895.00	\$89.50
05/21/2019	WNL	PD	Review and comment on draft Motion To determine that Plan Modifications are not Material.	0.40	895.00	\$358.00
05/21/2019	WNL	PD	Review and analyze issues raised by Motion to Determine Plan Modifications are not material.	0.50	895.00	\$447.50
05/21/2019	WNL	PD	Telephone call with Alan Friedman re: Motion to Determine Modifications to Plan are not material.	0.10	895.00	\$89.50
05/21/2019	WNL	PD	Review correspondence re: additional information requested by Barry Beitler.	0.20	895.00	\$179.00
05/21/2019	WNL	PD	Review correspondence re: Third Amended Plan.	0.20	895.00	\$179.00
05/21/2019	WNL	PD	Review correspondence re: information requested by Barry Beitler.	0.10	895.00	\$89.50
05/21/2019	WNL	PD	Review and analyze Motion To Modify Plan.	0.40	895.00	\$358.00
05/21/2019	TCF	PD	Review and revise plan modification motion.	0.80	695.00	\$556.00
05/22/2019	WNL	PD	Review correspondence re: response to Beitler	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			request for additional information.			
05/27/2019	WNL	PD	Review profit and loss statements being delivered to Barry Beitler.	0.10	895.00	\$89.50
05/28/2019	WNL	PD	Telephone call with Alan Friedman re: settlement negotiations with Barry Beitler.	0.10	895.00	\$89.50
05/28/2019	WNL	PD	Review correspondence re: settlement negotiations with Barry Beitler.	0.10	895.00	\$89.50
05/28/2019	WNL	PD	Telephone call with Gary Klausner, Tom Lallas and Alan Friedman re: settlement issues.	0.50	895.00	\$447.50
05/28/2019	WNL	PD	Telephone call with Alan Friedman re: results of call with Gary Klausner and Tom Lallas and settlement issues.	0.20	895.00	\$179.00
05/28/2019	WNL	PD	Review correspondence re: additional information to be given to Bary Beitler.	0.10	895.00	\$89.50
05/30/2019	WNL	PD	Review correspondence re: extension of deadline to respond to Motion to Modify Plan.	0.10	895.00	\$89.50
05/30/2019	WNL	PD	Review correspondence re: Replies to Objections to Motion to Modify Plan.	0.10	895.00	\$89.50
05/30/2019	TCF	PD	Review and analysis of confirmation issues.	0.20	695.00	\$139.00
05/30/2019	TCF	PD	Correspondence with A. Friedman regarding confirmation issues.	0.10	695.00	\$69.50
05/31/2019	WNL	PD	Review and execute Stipulation to Extend Deadline to File An Opposition to the Modified Third Amended Plan.	0.10	895.00	\$89.50
05/31/2019	WNL	PD	Telephone calls with Alan Friedman and Gary Pemberton re: valuation issues.	0.60	895.00	\$537.00
05/31/2019	WNL	PD	Review additional information being supplied to Barry Beitler.	0.20	895.00	\$179.00
05/31/2019	NPL	PD	Draft email to G. Klausner regarding stipulation to continue plan deadlines.	0.10	250.00	\$25.00
				<hr/> 34.30		<hr/> \$25,948.50

Stay Litigation [B140]

04/09/2019	NPL	SL	Review Beitler's response to professional fees incurred by Pachulski Stang Žiehl and Jones and Shulman Hodges regarding contempt motion.	0.10	250.00	\$25.00
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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/11/2019	NPL	SL	Review and reply to email from L. Gauthier regarding reply to Beitlers' opposition to professional fees related to Contempt Motiom.	0.10	250.00
			0.20		\$50.00
TOTAL SERVICES FOR THIS MATTER:					\$45,694.00

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Expenses

04/24/2019	BM	Business Meal [E111] Jersey Mikes, working meal, WNL	56.50
04/30/2019	AT	Auto Travel Expense [E109] OC Parking, WNL	20.00
04/30/2019	FF	Filing Fee [E112] DDS Legal Support, WNL	14.15
04/30/2019	PO	Postage [E108] USPS - Date range 4/19/2019 - 4/30/2019, JMO	2.60
05/01/2019	BM	Business Meal [E111] Cafe Cultura, working meal, WNL	92.84
05/06/2019	RE2	SCAN/COPY (53 @0.10 PER PG)	5.30
05/13/2019	LN	10601.00001 Lexis Charges for 05-13-19	97.47
05/16/2019	FF	Filing Fee [E112] USBC, Central District of California, WNL	700.00
05/17/2019	LN	10601.00001 Lexis Charges for 05-17-19	26.78
05/21/2019	RE2	SCAN/COPY (27 @0.10 PER PG)	2.70
05/21/2019	RE2	SCAN/COPY (19 @0.10 PER PG)	1.90
05/31/2019	PAC	Pacer - Court Research	3.60
Total Expenses for this Matter			\$1,023.84

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REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 05/31/2019

Total Fees	\$45,694.00
Total Expenses	1,023.84
Total Due on Current Invoice	\$46,717.84

Outstanding Balance from prior invoices as of 05/31/2019		(May not include recent payments)	
A/R Bill Number	Invoice Date	Fees Billed	Expenses Billed
118521	01/31/2018	\$64,977.50	\$1.40
118768	02/28/2018	\$89,105.00	\$6,717.72
119267	03/31/2018	\$170,795.00	\$818.42
119338	04/30/2018	\$241,285.00	\$12,901.06
119732	06/13/2018	\$165,330.00	\$2,241.54
119915	06/30/2018	\$127,527.50	\$476.66
120454	07/31/2018	\$120,280.00	\$2,092.83
120456	08/31/2018	\$83,337.00	\$1,155.30
120968	11/30/2018	\$201,480.00	\$2,218.98
121257	01/30/2019	\$94,400.00	\$1,256.33
121588	02/12/2019	\$10,583.50	\$88.30
121688	02/28/2019	\$4,274.00	\$121.50
122286	04/30/2019	\$108,840.50	\$338.55

Total Amount Due on Current and Prior Invoices: **\$1,559,361.43**

Pachulski Stang Ziehl & Jones LLP

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Client 10601

Matter 00001

WNL

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 06/30/2019

FEES	\$46,730.00
EXPENSES	\$342.59
TOTAL CURRENT CHARGES	\$47,072.59
BALANCE FORWARD	\$1,559,361.43
TOTAL BALANCE DUE	\$1,606,434.02

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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	2.90	\$725.00
TCF	Flanagan, Tavi C.	Counsel	695.00	34.00	\$23,630.00
WNL	Lobel, William N.	Partner	895.00	25.00	\$22,375.00
				61.90	\$46,730.00

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
BL	Bankruptcy Litigation [L430]	0.60	\$537.00
BO	Business Operations	13.70	\$9,698.50
CA	Case Administration [B110]	1.30	\$583.00
CO	Claims Admin/Objections[B310]	0.80	\$587.00
LN	Litigation (Non-Bankruptcy)	0.30	\$268.50
PD	Plan & Disclosure Stmt. [B320]	45.20	\$35,056.00
		61.90	<hr/> \$46,730.00

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$2.52
Lexis/Nexis- Legal Research [E	\$157.32
Outside Services	\$120.00
Pacer - Court Research	\$1.60
Postage [E108]	\$16.25
Reproduction/ Scan Copy	\$44.90
	<hr/>
	\$342.59

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bankruptcy Litigation [L430]						
06/17/2019	WNL	BL	Review and revise Bral's Motion to Dismiss Steward non dischargeability complaint.	0.40	895.00	\$358.00
06/18/2019	WNL	BL	Review and analyze Amended Motion To Dismiss Steward non-dischargeability complaint.	0.20	895.00	\$179.00
				0.60		\$537.00
Business Operations						
06/04/2019	WNL	BO	Review correspondence re: Beitler's Response to Motion to Use Estate Funds to Pay Ordinary Living Expenses.	0.10	895.00	\$89.50
06/04/2019	WNL	BO	Review correspondence re: pending hearing on Motion to Use Estate Funds.	0.10	895.00	\$89.50
06/04/2019	WNL	BO	Review and analyze Beitler Opposition to Motion To Use Estate Funds for Ordinary Living Expenses.	0.20	895.00	\$179.00
06/04/2019	WNL	BO	Review additional correspondence re: Beitler Opposition to Motion to Use estate Funds to Pay Ordinary Living Expenses.	0.10	895.00	\$89.50
06/04/2019	WNL	BO	Review correspondence re: timing of John Bral's receiving his monthly stipend.	0.10	895.00	\$89.50
06/04/2019	WNL	BO	Review correspondence re: hearing on Motion to Approve Use of Estate Funds	0.10	895.00	\$89.50
06/04/2019	TCF	BO	Telephone conference with A. Friedman regarding use of estate funds.	0.10	695.00	\$69.50
06/04/2019	NPL	BO	Review emails regarding Beitler opposition to motion to use estate funds.	0.20	250.00	\$50.00
06/05/2019	TCF	BO	Telephone conference with A. Friedman regarding use of estate funds.	0.10	695.00	\$69.50
06/05/2019	TCF	BO	Telephone conference with J. Bral regarding use of estate funds; information needed for reply.	0.10	695.00	\$69.50
06/05/2019	TCF	BO	Telephone conference with L. Gauthier regarding use of estate funds; information needed for reply.	0.10	695.00	\$69.50
06/06/2019	WNL	BO	Review correspondence re: Court's continuance of hearing on Motion to Use Estate Funds for Ordinary Expenses.	0.10	895.00	\$89.50
06/07/2019	TCF	BO	Research and review issues regarding use of estate	5.40	695.00	\$3,753.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			funds; draft reply regarding same.			
06/08/2019	TCF	BO	Research and review regarding reply to opposition to use of estate funds.	0.30	695.00	\$208.50
06/10/2019	TCF	BO	Review and revise reply to opposition to use of estate funds.	1.20	695.00	\$834.00
06/10/2019	TCF	BO	Telephone conference with J. Bral regarding reply to opposition to use of estate funds.	0.30	695.00	\$208.50
06/10/2019	TCF	BO	Telephone conference with A. Friedman regarding reply to opposition to use of estate funds.	0.10	695.00	\$69.50
06/10/2019	TCF	BO	Review and analysis of correspondence regarding reply to opposition to use of estate funds; Telephone conference with A. Friedman regarding same.	0.20	695.00	\$139.00
06/11/2019	WNL	BO	Review draft of Reply re: Motion To Use Property Of The Estate and supporting Declaration of John Bral.	0.30	895.00	\$268.50
06/11/2019	WNL	BO	Review Exhibits to Reply.	0.20	895.00	\$179.00
06/11/2019	WNL	BO	Review correspondence re: sources of income for John Bral and related issues.	0.20	895.00	\$179.00
06/11/2019	WNL	BO	Review correspondence re: revision of Motion To Use Property Of The Estate.	0.10	895.00	\$89.50
06/11/2019	WNL	BO	Review exhibits to John Bral's declaration in support of Expenses Motion.	0.10	895.00	\$89.50
06/11/2019	TCF	BO	Telephone conference with team regarding reply to opposition to use of estate funds.	0.10	695.00	\$69.50
06/11/2019	TCF	BO	Coordination regarding Reply to Opposition to Use of Estate Funds and filing.	0.30	695.00	\$208.50
06/11/2019	NPL	BO	Draft email to L. Gauthier regarding reply to Beitler Parties' Objection to Motion to Use Estate Funds.	0.10	250.00	\$25.00
06/11/2019	NPL	BO	Draft email to Bral team regarding Reply to Beitler Parties' Objection to Motion to Use Estate Funds.	0.10	250.00	\$25.00
06/11/2019	NPL	BO	Review and reply to email from T. Flanagan regarding exhibits to reply to Beitler Parties' Objection to Motion to Use Estate Funds.	0.10	250.00	\$25.00
06/11/2019	NPL	BO	Review and reply to email from T. Flanagan regarding Reply to Beitler Parties' Objection to Motion to Use Estate Funds.	0.10	250.00	\$25.00
06/11/2019	NPL	BO	Revise and finalize Reply to Beitler Parties'	0.80	250.00	\$200.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			Objection to Motion to Use Estate Funds.			
06/12/2019	WNL	BO	Review revised Expense Motion and Supporting Declaration.	0.40	895.00	\$358.00
06/12/2019	WNL	BO	Review initial draft of Reply to Beitler's Opposition to Motion To Use Property of the Estate to Pay Debtor's Expenses.	0.30	895.00	\$268.50
06/23/2019	WNL	BO	Review and analyze Motion For Order Authorizing The Use Of Property Of The Estate To Pay The Debtor's Expenses, Beitler's Opposition and Debtor's Reply.	0.90	895.00	\$805.50
06/24/2019	WNL	BO	Confer with Alan Friedman re: preparation for hearing on Motion To Use Property Of The Estate To Pay Living expenses.	0.50	895.00	\$447.50
06/26/2019	WNL	BO	Telephone call with Alan Friedman re: issues concerning Motion to Approve Use of Estate Funds to Pay Living Expenses.	0.10	895.00	\$89.50
06/29/2019	WNL	BO	Review final form of Order Aproving Use Of Estate Funds for Personal Expenses.	0.10	895.00	\$89.50
				13.70	\$9,698.50	

Case Administration [B110]

06/04/2019	WNL	CA	Review updated summary of pending deadlines.	0.10	895.00	\$89.50
06/06/2019	NPL	CA	Attention to dates and deadlines regarding outstanding matters, task list and claim objections.	0.80	250.00	\$200.00
06/12/2019	NPL	CA	Review and reply to email from T. Flanagan regarding dates and deadlines.	0.10	250.00	\$25.00
06/17/2019	WNL	CA	Review Monthly Operating Report for May, 2019.	0.10	895.00	\$89.50
06/19/2019	WNL	CA	Review updated critical date summary.	0.10	895.00	\$89.50
06/28/2019	WNL	CA	Review updated critical dates sumary.	0.10	895.00	\$89.50
				1.30	\$583.00	

Claims Admin/Objections[B310]

06/10/2019	NPL	CO	Review and reply to email from L. Gauthier regarding amended objection to Steward proof of claim.	0.10	250.00	\$25.00
06/10/2019	NPL	CO	Confer with W. Lobel regarding amended objection to Steward proof of claim.	0.10	250.00	\$25.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/11/2019	WNL	CO	Review correspondence re: amended objection to Steward claim and Motion to Dismiss.	0.20	895.00	\$179.00
06/17/2019	WNL	CO	Review and comment on Debtor's Amended Objection To Steward Claim.	0.40	895.00	\$358.00
				0.80		\$587.00

Litigation (Non-Bankruptcy)

06/18/2019	WNL	LN	Review revised Motion To Dismiss Steward litigation.	0.20	895.00	\$179.00
06/19/2019	WNL	LN	Review Request For Judicial Notice in Steward Financial litigation.	0.10	895.00	\$89.50
				0.30		\$268.50

Plan & Disclosure Stmt. [B320]

06/01/2019	TCF	PD	Various communications with team regarding plan negotiations.	0.20	695.00	\$139.00
06/01/2019	TCF	PD	Correspondence with A. Friedman regarding Beitler negotiations and issues.	0.10	695.00	\$69.50
06/02/2019	WNL	PD	Review and respond to correspondence re: possible change in terms of plan.	0.10	895.00	\$89.50
06/02/2019	WNL	PD	Review and respond to additional correspondence re: potential change to language of the plan.	0.10	895.00	\$89.50
06/03/2019	WNL	PD	Telephone call with Alan Friedman re: changes in language of Plan.	0.20	895.00	\$179.00
06/03/2019	WNL	PD	Review revised language in the Plan and related correspondence.	0.20	895.00	\$179.00
06/03/2019	WNL	PD	Review and respond to correspondence re: plan language.	0.30	895.00	\$268.50
06/03/2019	WNL	PD	Telephone call with Alan Friedman and Gary Pemberton re: Plan issues.	0.30	895.00	\$268.50
06/03/2019	WNL	PD	Review correspondence re: extension of deadlines to respond to modified Plan.	0.10	895.00	\$89.50
06/03/2019	WNL	PD	Review correspondence re: information re: Javaher to be given to Barry Beitler.	0.10	895.00	\$89.50
06/03/2019	WNL	PD	Review correspondence re: purpose for information requests allegedly for purchase numbers.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/03/2019	WNL	PD	Review revised plan and analyze issues.	0.20	895.00	\$179.00
06/03/2019	WNL	PD	Review correspondence re: information concerning Javaher property to be sent to Barry Beitler.	0.10	895.00	\$89.50
06/03/2019	WNL	PD	Review correspondence re: definition of "Applicable Adjustment."	0.10	895.00	\$89.50
06/03/2019	TCF	PD	Correspondence with A. Friedman regarding plan issues.	0.10	695.00	\$69.50
06/03/2019	TCF	PD	Review and analysis of plan issues.	0.10	695.00	\$69.50
06/03/2019	TCF	PD	Review and analysis of stipulation regarding plan continuance and deadlines.	0.10	695.00	\$69.50
06/03/2019	TCF	PD	Research and review regarding plan issues.	1.40	695.00	\$973.00
06/03/2019	NPL	PD	Review and reply to email from L. Gauthier regarding hearing on amended plan and disclosure statement.	0.10	250.00	\$25.00
06/04/2019	WNL	PD	Review correspondence re: timing issues and non payment of John Bral's living expenses.	0.10	895.00	\$89.50
06/04/2019	WNL	PD	Telephone call with Alan Friedman re: various pending issues and use of cash to fund living expenses.	0.20	895.00	\$179.00
06/04/2019	WNL	PD	Review correspondence re: continuance of hearing on Disclosure Statement and related scheduling issues.	0.20	895.00	\$179.00
06/04/2019	WNL	PD	Review correspondence re request to continue hearing on confirmation.	0.10	895.00	\$89.50
06/04/2019	WNL	PD	Review correspondence re: confirmation hearing.	0.10	895.00	\$89.50
06/04/2019	WNL	PD	Review correspondence re: requested continuance of confirmation hearing.	0.10	895.00	\$89.50
06/04/2019	WNL	PD	Second telephone call with Alan Friedman re: settlement issues and strategies.	0.20	895.00	\$179.00
06/04/2019	WNL	PD	Review Order Continuing Dates for pending hearings, including confirmation hearing.	0.10	895.00	\$89.50
06/04/2019	TCF	PD	Review and analysis of plan issues and objections.	0.50	695.00	\$347.50
06/04/2019	TCF	PD	Review and analysis of use of estate funds.	0.30	695.00	\$208.50
06/04/2019	TCF	PD	Telephone conference with A. Friedman regarding plan objections.	0.10	695.00	\$69.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/05/2019	WNL	PD	Review correspondence and Order re: extension of deadlines in Plan confirmation process.	0.10	895.00	\$89.50
06/05/2019	WNL	PD	Review correspondence re: Plan.	0.10	895.00	\$89.50
06/05/2019	WNL	PD	Review correspondence re: scheduling issues.	0.10	895.00	\$89.50
06/05/2019	WNL	PD	Review and execute revised Stipulation Extending Deadlines.	0.10	895.00	\$89.50
06/05/2019	WNL	PD	Review additional correspondence re: continuance of pending deadlines and hearing dates.	0.10	895.00	\$89.50
06/05/2019	NPL	PD	Review and reply to email from L. Gauthier regarding continued hearings regarding plan.	0.10	250.00	\$25.00
06/06/2019	WNL	PD	Review correspondence re: information requested by Barry Beitler.	0.10	895.00	\$89.50
06/06/2019	WNL	PD	Review additional correspondence re: timing issues concerning Plan confirmation.	0.20	895.00	\$179.00
06/06/2019	WNL	PD	Review correspondence re: continuance of hearing by the Court.	0.10	895.00	\$89.50
06/06/2019	WNL	PD	Review correspondence re: information requested by Barry Beitler.	0.10	895.00	\$89.50
06/06/2019	WNL	PD	Review correspondence re: information requested by Barry Beitler.	0.10	895.00	\$89.50
06/06/2019	NPL	PD	Telephone call with L. Gauthier regarding dates and deadlines associated with plan confirmation.	0.10	250.00	\$25.00
06/06/2019	NPL	PD	Review and reply to email from L. Gauthier regarding critical dates and deadlines.	0.10	250.00	\$25.00
06/11/2019	WNL	PD	Confer with Alan Friedman re: Plan issues and modification of the Plan.	0.40	895.00	\$358.00
06/12/2019	WNL	PD	Conference call with Alan Friedman, John Bral, Gary Pemberton and Tavi Flanagan re: Beitler objections to draft plan.	0.80	895.00	\$716.00
06/12/2019	WNL	PD	Review Opposition to Amended chapter 11 plan and transcript of hearing on plan issues.	0.70	895.00	\$626.50
06/12/2019	TCF	PD	Review and analysis of objections to plan.	0.30	695.00	\$208.50
06/12/2019	TCF	PD	Correspondence with A. Friedman regarding objections to plan.	0.10	695.00	\$69.50
06/12/2019	TCF	PD	All-hands call regarding objections to plan and	0.90	695.00	\$625.50

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				Hours	Rate	Amount
			settlement issues.			
06/12/2019	TCF	PD	Draft confirmation reply.	3.20	695.00	\$2,224.00
06/12/2019	TCF	PD	Attend to confirmation and plan issues, objections and settlement negotiations.	1.80	695.00	\$1,251.00
06/13/2019	TCF	PD	Continue draft confirmation reply.	3.80	695.00	\$2,641.00
06/14/2019	WNL	PD	Review correspondence re: documents to be delivered to Barry Beitler.	0.10	895.00	\$89.50
06/14/2019	WNL	PD	Review financial information being given to Barry Beitler.	0.20	895.00	\$179.00
06/14/2019	WNL	PD	Review and comment on Third Amended Chapter 11 Plan As Modified.	0.30	895.00	\$268.50
06/14/2019	TCF	PD	Draft confirmation reply; review and revise plan; draft declaration in support.	2.80	695.00	\$1,946.00
06/16/2019	TCF	PD	Attend to plan confirmation issues; various communications with W. Lobel and A. Friedman regarding same.	0.40	695.00	\$278.00
06/17/2019	WNL	PD	Review and revise Reply to Beitler's Opposition to Motion For Determination Re; Modified Plan.	0.40	895.00	\$358.00
06/17/2019	WNL	PD	Review and respond to correspondence re: review of draft Reply.	0.10	895.00	\$89.50
06/17/2019	WNL	PD	Review correspondence re: information to be given to Barry Beitler.	0.10	895.00	\$89.50
06/17/2019	WNL	PD	Review additional correspondence re:Third Amended Plan.	0.10	895.00	\$89.50
06/17/2019	WNL	PD	Review and analyze correspondence re: issues raised by and changes needed to Amended Plan.	0.40	895.00	\$358.00
06/17/2019	WNL	PD	Review additional correspondence re: information to be delivered to Barry Beitler.	0.10	895.00	\$89.50
06/17/2019	WNL	PD	Review additional correspondence re: proposed changes to Modified Plan.	0.10	895.00	\$89.50
06/17/2019	WNL	PD	Review additional correspondence re: information to be given to Barry Beitler.	0.20	895.00	\$179.00
06/17/2019	WNL	PD	Review comments to Third Amended Plan.	0.20	895.00	\$179.00
06/17/2019	WNL	PD	Review correspondence re: evidence of information sent to Barry Beitler.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/17/2019	WNL	PD	Review correspondence re: revised Plan.	0.10	895.00	\$89.50
06/17/2019	WNL	PD	Review additional correspondence re: financial information being given to Barry Beitler.	0.20	895.00	\$179.00
06/17/2019	TCF	PD	Attend to plan confirmation issues and reply.	0.60	695.00	\$417.00
06/17/2019	TCF	PD	Review and revise plan confirmation reply, plan and declaration in support of confirmation.	0.80	695.00	\$556.00
06/17/2019	TCF	PD	Finalize plan confirmation reply, plan and declaration in support of confirmation.	0.90	695.00	\$625.50
06/17/2019	TCF	PD	Finalize and coordination regarding filing of plan pleadings.	1.80	695.00	\$1,251.00
06/18/2019	WNL	PD	Review Gary Pemberton's comments to latest version of the Third Amended Plan.	0.10	895.00	\$89.50
06/18/2019	WNL	PD	Review correspondence re: proof of delivery of information requested by Barry Beitler.	0.10	895.00	\$89.50
06/18/2019	WNL	PD	Telephone calls with Alan Friedman re:various pending issues..	0.30	895.00	\$268.50
06/18/2019	WNL	PD	Telephone call with John Bral and Alan Friedman re: issues concerning the release of Bral Realty in the Plan.	0.10	895.00	\$89.50
06/18/2019	WNL	PD	Review correspondence re: Stipulation with CitiMortgage.	0.10	895.00	\$89.50
06/18/2019	WNL	PD	Review correspondence re:issues concerning terms of settlement.	0.20	895.00	\$179.00
06/18/2019	TCF	PD	Telephone conference with A. Friedman regarding plan confirmation issues.	0.20	695.00	\$139.00
06/18/2019	TCF	PD	Review and revise plan and reply.	0.80	695.00	\$556.00
06/18/2019	TCF	PD	Correspondence with team regarding revised plan and reply.	0.10	695.00	\$69.50
06/18/2019	TCF	PD	Attend to confirmation matters and preparation.	1.20	695.00	\$834.00
06/20/2019	WNL	PD	Review correspondence re: preparation for confirmation hearing.	0.20	895.00	\$179.00
06/20/2019	WNL	PD	Review and analyze G. Klausner email re: remaining settlement issues and responses thereto.	0.20	895.00	\$179.00
06/20/2019	WNL	PD	Review correspondence re: Avalon loan.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/20/2019	WNL	PD	Review additional correspondence re: preparation for confirmation hearing.	0.10	895.00	\$89.50
06/20/2019	WNL	PD	Review additional correspondence re: Avalon facts and issues.	0.10	895.00	\$89.50
06/20/2019	WNL	PD	Review correspondence re: secured debt against Mission and Westcliff.	0.10	895.00	\$89.50
06/20/2019	TCF	PD	Review and analysis of plan issues.	0.40	695.00	\$278.00
06/20/2019	TCF	PD	Correspondence A. Friedman regarding plan issues.	0.10	695.00	\$69.50
06/20/2019	TCF	PD	Review and analysis and research regarding plan confirmation and claim issues.	0.60	695.00	\$417.00
06/21/2019	WNL	PD	Review correspondence re: amount of secured debt against Mission and Westcliff.	0.10	895.00	\$89.50
06/21/2019	WNL	PD	Confer with Alan Friedman re: preparation for confirmation hearing.	0.20	895.00	\$179.00
06/21/2019	TCF	PD	Telephone conference with A. Friedman regarding plan issues.	0.20	695.00	\$139.00
06/24/2019	WNL	PD	Confer with Alan Friedman re: preparation for confirmation hearing.	2.40	895.00	\$2,148.00
06/24/2019	WNL	PD	Telephone call with John Bral re: plan and settlement issues.	0.70	895.00	\$626.50
06/24/2019	WNL	PD	Telephone call with Gary Pemberton and Alan Friedman re: preparation for confirmation hearing.	0.70	895.00	\$626.50
06/24/2019	WNL	PD	Telephone call with Gary Klausner re: settlement issues.	0.20	895.00	\$179.00
06/24/2019	WNL	PD	Review and analyze annotations to transcript of confirmation hearing and Beitler Objection to Third Amended Plan.	0.30	895.00	\$268.50
06/25/2019	WNL	PD	Review and analyze analysis of settlement versus various litigation outcomes.	0.10	895.00	\$89.50
06/25/2019	WNL	PD	Review additional comments on analysis of settlement versus litigation option.	0.10	895.00	\$89.50
06/25/2019	WNL	PD	Telephone call with Alan Friedman re: settlement issues and pending confirmation hearing.	0.20	895.00	\$179.00
06/26/2019	WNL	PD	Finalize preparation for confirmation hearing.	0.60	895.00	\$537.00
06/26/2019	WNL	PD	Confer with Alan Friedman re: arguments to be	0.80	895.00	\$716.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			made at confirmation hearing.			
06/26/2019	WNL	PD	Attendance at final confirmation hearing.	1.70	895.00	\$1,521.50
06/26/2019	WNL	PD	Telephone call with Alan Friedman re: language of order approving confirmation.	0.20	895.00	\$179.00
06/26/2019	TCF	PD	Attend to plan confirmation issues.	1.00	695.00	\$695.00
06/26/2019	TCF	PD	Additional attention to plan and confirmation issues.	0.80	695.00	\$556.00
06/27/2019	WNL	PD	Review correspondence re: tax consequences of buy out of Debtors interests in Mission and Westcliff.	0.10	895.00	\$89.50
06/27/2019	WNL	PD	Review correspondence re: settlement issues.	0.20	895.00	\$179.00
06/28/2019	WNL	PD	Telephone call with Alan Friedman re: additional plan issues.	0.10	895.00	\$89.50
				45.20		\$35,056.00
TOTAL SERVICES FOR THIS MATTER:						\$46,730.00

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Expenses

05/20/2019	CC	Conference Call [E105] AT&T Conference Call, WNL	2.52
06/07/2019	LN	10601.00001 Lexis Charges for 06-07-19	157.32
06/10/2019	RE2	SCAN/COPY (26 @0.10 PER PG)	2.60
06/10/2019	RE2	SCAN/COPY (18 @0.10 PER PG)	1.80
06/11/2019	PO	Postage [E108] Courtesy Copies to Judge Chambers, WNL	16.25
06/11/2019	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
06/13/2019	OS	Case Anywhere LLC, WNL	120.00
06/16/2019	RE2	SCAN/COPY (46 @0.10 PER PG)	4.60
06/16/2019	RE2	SCAN/COPY (11 @0.10 PER PG)	1.10
06/17/2019	RE2	SCAN/COPY (18 @0.10 PER PG)	1.80
06/17/2019	RE2	SCAN/COPY (26 @0.10 PER PG)	2.60
06/17/2019	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
06/17/2019	RE2	SCAN/COPY (13 @0.10 PER PG)	1.30
06/19/2019	RE2	SCAN/COPY (33 @0.10 PER PG)	3.30
06/19/2019	RE2	SCAN/COPY (33 @0.10 PER PG)	3.30
06/22/2019	RE2	SCAN/COPY (88 @0.10 PER PG)	8.80
06/22/2019	RE2	SCAN/COPY (34 @0.10 PER PG)	3.40
06/22/2019	RE2	SCAN/COPY (26 @0.10 PER PG)	2.60
06/22/2019	RE2	SCAN/COPY (24 @0.10 PER PG)	2.40
06/22/2019	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
06/30/2019	PAC	Pacer - Court Research	1.60

Total Expenses for this Matter \$342.59

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REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 06/30/2019

Total Fees	\$46,730.00
Total Expenses	342.59
Total Due on Current Invoice	\$47,072.59

Outstanding Balance from prior invoices as of 06/30/2019		(May not include recent payments)	
A/R Bill Number	Invoice Date	Fees Billed	Expenses Billed
118521	01/31/2018	\$64,977.50	\$1.40
118768	02/28/2018	\$89,105.00	\$6,717.72
119267	03/31/2018	\$170,795.00	\$818.42
119338	04/30/2018	\$241,285.00	\$12,901.06
119732	06/13/2018	\$165,330.00	\$2,241.54
119915	06/30/2018	\$127,527.50	\$476.66
120454	07/31/2018	\$120,280.00	\$2,092.83
120456	08/31/2018	\$83,337.00	\$1,155.30
120968	11/30/2018	\$201,480.00	\$2,218.98
121257	01/30/2019	\$94,400.00	\$1,256.33
121588	02/12/2019	\$10,583.50	\$88.30
121688	02/28/2019	\$4,274.00	\$121.50
122286	04/30/2019	\$108,840.50	\$338.55
122553	05/31/2019	\$45,694.00	\$1,023.84

Total Amount Due on Current and Prior Invoices: **\$1,606,434.02**

Pachulski Stang Ziehl & Jones LLP

July 31, 2019

Invoice 122916

Client 10601

Matter 00001

WNL

John J. Bral
2601 Main Street ste. 9601
Irvine, CA 92614

RE: Chapter 11

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 07/31/2019

FEES	\$19,785.00
EXPENSES	\$51.33
TOTAL CURRENT CHARGES	\$19,836.33
BALANCE FORWARD	\$1,606,434.02
TOTAL BALANCE DUE	\$1,626,270.35

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Summary of Services by Professional

ID	Name	Title	Rate	Hours	Amount
NPL	Lockwood, Nancy P. F.	Paralegal	250.00	19.60	\$4,900.00
TCF	Flanagan, Tavi C.	Counsel	695.00	10.60	\$7,367.00
WNL	Lobel, William N.	Partner	895.00	8.40	\$7,518.00
				38.60	\$19,785.00

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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	0.10	\$89.50
CA	Case Administration [B110]	1.10	\$468.50
CO	Claims Admin/Objections[B310]	0.60	\$537.00
FE	Fee/Employment Application	20.20	\$6,146.50
LN	Litigation (Non-Bankruptcy)	0.60	\$472.50
PD	Plan & Disclosure Stmt. [B320]	16.00	\$12,071.00
		38.60	\$19,785.00

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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Auto Travel Expense [E109]	\$4.00
Working Meals [E111]	\$47.33
	<hr/> <hr/> \$51.33

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
07/30/2019	WNL	AA	Review correspondence re: Betitler's refusal to amend claim # 10 to assist in the litigation against Bobby Samini.	0.10	895.00	\$89.50
				<hr/> 0.10		<hr/> \$89.50
Case Administration [B110]						
07/16/2019	WNL	CA	Review Monthly Operating report Number 28.	0.10	895.00	\$89.50
07/17/2019	WNL	CA	Review updated critical date memo.	0.10	895.00	\$89.50
07/17/2019	NPL	CA	Review and reply to email from L. Gauthier regarding dates and deadline memorandum.	0.10	250.00	\$25.00
07/17/2019	NPL	CA	Attention to outstanding dates, deadlines and tasks.	0.30	250.00	\$75.00
07/31/2019	WNL	CA	Review revised schedule of upcoming dates and deadlines.	0.10	895.00	\$89.50
07/31/2019	NPL	CA	Review and reply to email from L. Gauthier regarding updated critical date memorandum.	0.10	250.00	\$25.00
07/31/2019	NPL	CA	Attention to updating and reviewing outstanding dates and deadlines pursuant to critical date memorandum.	0.30	250.00	\$75.00
				<hr/> 1.10		<hr/> \$468.50
Claims Admin/Objections[B310]						
07/08/2019	WNL	CO	Review correspondence re: request for continuance of hearing on claims objections.	0.20	895.00	\$179.00
07/09/2019	WNL	CO	Review correspondence re: continuance of hearing on objection to claim.	0.10	895.00	\$89.50
07/10/2019	WNL	CO	Review pleadings re: objection to Steward Financial claim and related matters.	0.10	895.00	\$89.50
07/10/2019	WNL	CO	Review correspondence re: hearing on objection to the Steward Financial claim.	0.10	895.00	\$89.50
07/12/2019	WNL	CO	Review Orders approving continuance of hearing and related deadlines re: Objection to Proof of Claim.	0.10	895.00	\$89.50
				<hr/> 0.60		<hr/> \$537.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Fee/Employment Application						
07/10/2019	WNL	FE	Review correspondence re: fee applications.	0.10	895.00	\$89.50
07/10/2019	WNL	FE	Review correspondence and confer with Nancy Lockwood re: fee applications.	0.20	895.00	\$179.00
07/10/2019	WNL	FE	Review correspondence re: preparation of fee application.	0.10	895.00	\$89.50
07/10/2019	WNL	FE	Review additional correspondence re: preparation of fee application.	0.10	895.00	\$89.50
07/10/2019	NPL	FE	Review and reply to email from A. Friedman regarding fee application.	0.10	250.00	\$25.00
07/10/2019	NPL	FE	Review and reply to email from L. Gauthier regarding fee application.	0.10	250.00	\$25.00
07/10/2019	NPL	FE	Review professional fees for preparation of fee application.	1.20	250.00	\$300.00
07/10/2019	NPL	FE	Begin preparation of fee application for Pachulski Stang Ziehl & Jones.	2.30	250.00	\$575.00
07/11/2019	NPL	FE	Continued preparation of fee application.	1.10	250.00	\$275.00
07/15/2019	NPL	FE	Analysis of billing regarding fee application for Pachulski Stang Ziehl & Jones.	2.10	250.00	\$525.00
07/16/2019	WNL	FE	Review correspondence re: fee applications and hearing.	0.10	895.00	\$89.50
07/16/2019	WNL	FE	Review correspondence re: fee application issues.	0.10	895.00	\$89.50
07/16/2019	NPL	FE	Telephone call with W. Ramseyer regarding fee application for Pachulski Stang Ziehl & Jones.	0.40	250.00	\$100.00
07/16/2019	NPL	FE	Draft email to W. Ramseyer regarding fee application for Pachulski Stang Ziehl & Jones.	0.10	250.00	\$25.00
07/16/2019	NPL	FE	Review and analysis of billing for preparation of fee application for Pachulski Stang Ziehl & Jones.	4.60	250.00	\$1,150.00
07/16/2019	NPL	FE	Review email from W. Ramseyer regarding final fee application.	0.10	250.00	\$25.00
07/17/2019	WNL	FE	Review correspondence re: preparation of fee application.	0.10	895.00	\$89.50
07/17/2019	WNL	FE	Review additional correspondence re commencing preparation of the fee application.	0.10	895.00	\$89.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/17/2019	NPL	FE	Review notice to professionals regarding final fee applications.	0.10	250.00	\$25.00
07/17/2019	NPL	FE	Draft email to W. Ramseyer regarding dates and deadlines associated with final fee application.	0.10	250.00	\$25.00
07/22/2019	WNL	FE	Review and revise June pre-bill.	0.80	895.00	\$716.00
07/22/2019	NPL	FE	Continued analysis of billing for fee application preparation and exhibits.	3.10	250.00	\$775.00
07/29/2019	NPL	FE	Review and analysis of billing statements.	1.80	250.00	\$450.00
07/30/2019	NPL	FE	Review and reply to email from W. Ramseyer regarding billing statements for PSZJ.	0.10	250.00	\$25.00
07/31/2019	NPL	FE	Review and analysis of PSZJ billing statements for exhibits to the first and final fee applicaiton.	1.20	250.00	\$300.00
				20.20		\$6,146.50

Litigation (Non-Bankruptcy)

07/02/2019	WNL	LN	Review correspondence re: filing in the Mission v. Beitler litigation and review status report.	0.10	895.00	\$89.50
07/17/2019	WNL	LN	Review correspondence re: Bral v. Westcliff.	0.10	895.00	\$89.50
07/17/2019	WNL	LN	Review correspondence re: Bral v. Westcliff Investors.	0.10	895.00	\$89.50
07/30/2019	WNL	LN	Review and respond to correspondence re: hearings set for 8/15 re: pending litigation.	0.10	895.00	\$89.50
07/30/2019	NPL	LN	Review and reply to email from L. Gauthier regarding adversary status conferences.	0.10	250.00	\$25.00
07/31/2019	WNL	LN	Review pleadings in Beitler v Bral litigation.	0.10	895.00	\$89.50
				0.60		\$472.50

Plan & Disclosure Stmt. [B320]

07/01/2019	TCF	PD	Review and analysis of confirmation issues.	1.40	695.00	\$973.00
07/01/2019	TCF	PD	Draft confirmation order; revise plan.	4.80	695.00	\$3,336.00
07/02/2019	WNL	PD	Telephone call with Alan Friedman re: settlement issues and negotiations with Barry Beitler.	0.30	895.00	\$268.50
07/05/2019	TCF	PD	Review and analysis of plan confirmation issues and settlement issues; various communications with	0.40	695.00	\$278.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			team regarding same.			
07/08/2019	TCF	PD	Attend to confirmation issues, confirmation order and Fourth Amended Plan.	0.20	695.00	\$139.00
07/09/2019	WNL	PD	Review and respond to correspondence re: revised Confirmation Order and related correspondence..	0.40	895.00	\$358.00
07/09/2019	WNL	PD	Review Order continuing First Confirmation Status Report.	0.10	895.00	\$89.50
07/09/2019	WNL	PD	Review final versions of Confirmation Order and related pleadings.	0.20	895.00	\$179.00
07/09/2019	WNL	PD	Review redlined confirmation order and revised Fourth Amended Plan.	0.70	895.00	\$626.50
07/09/2019	TCF	PD	Review and revise confirmation order and Fourth Amended Plan.	1.20	695.00	\$834.00
07/09/2019	TCF	PD	Telephone conference with A. Friedman regarding confirmation order and Fourth Amended Plan.	0.20	695.00	\$139.00
07/09/2019	TCF	PD	Review and analysis of issues regarding confirmation order and Fourth Amended Plan; communications with respect thereto.	0.40	695.00	\$278.00
07/09/2019	NPL	PD	Review and reply to email from T. Flanagan regarding revised confirmation order.	0.10	250.00	\$25.00
07/10/2019	TCF	PD	Review and analysis of issues regarding confirmation order and Fourth Amended Plan; communications with respect thereto.	0.20	695.00	\$139.00
07/11/2019	WNL	PD	Review and execute stipulations to continue hearings on claim objection and Motion to Dismiss Adversary Proceeding.	0.10	895.00	\$89.50
07/15/2019	TCF	PD	Review and analysis of confirmation issues; various communications with team regarding same.	0.50	695.00	\$347.50
07/17/2019	WNL	PD	Review and analyze language proposed by Beitler re: dismissal of all litigation language in the plan and related correspondence.	0.30	895.00	\$268.50
07/17/2019	TCF	PD	Attend to confirmation related issues, plan and confirmation order.	0.80	695.00	\$556.00
07/18/2019	WNL	PD	Review and analyze correspondence and proposed language re: terms of release of claims provisions.	0.30	895.00	\$268.50
07/18/2019	WNL	PD	Telephone call with Alan Friedman re: negotiations with Gary Klausner re: language in Confirmation Order.	0.30	895.00	\$268.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/19/2019	WNL	PD	Telephone call with Alan Friedman re: settlement issues and action to be taken going forward.	0.20	895.00	\$179.00
07/19/2019	WNL	PD	Review correspondence re: negotiations with Barry Beitler.	0.10	895.00	\$89.50
07/24/2019	WNL	PD	Review correspondence re: revised plan language.	0.20	895.00	\$179.00
07/24/2019	WNL	PD	Review correspondence re: request for Donald Rezak to communicate directly with John Bral re: information on Mission and Westcliff.	0.10	895.00	\$89.50
07/24/2019	WNL	PD	Review correspondence re: Plan issues.	0.10	895.00	\$89.50
07/24/2019	WNL	PD	Review correspondence re: suggested additional language to add to the Plan.	0.20	895.00	\$179.00
07/24/2019	WNL	PD	Review correspondence re: information requested on Mission and Westcliff.	0.10	895.00	\$89.50
07/29/2019	WNL	PD	Review and analyze new language added to proposed confirmation order by Gary Klausner.	0.10	895.00	\$89.50
07/29/2019	WNL	PD	Review correspondence re: addition of language to draft confirmation order.	0.10	895.00	\$89.50
07/29/2019	WNL	PD	Review correspondence re: language of Confirmation Order.	0.20	895.00	\$179.00
07/29/2019	TCF	PD	Attend to confirmation issues; communications with team regarding same.	0.50	695.00	\$347.50
07/30/2019	WNL	PD	Review final form of Fourth Amended Plan and Confirmation Order.	0.80	895.00	\$716.00
07/31/2019	WNL	PD	Review correspondence re: change to language of Plan.	0.10	895.00	\$89.50
07/31/2019	WNL	PD	Review additional correspondence re: Beitler's comments to draft Plan.	0.20	895.00	\$179.00
07/31/2019	NPL	PD	Review entered order confirming Plan.	0.10	250.00	\$25.00
					16.00	\$12,071.00

TOTAL SERVICES FOR THIS MATTER: **\$19,785.00**

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Expenses

06/27/2019	AT	Auto Travel Expense [E109] Parking, WNL	4.00
06/27/2019	BM	Business Meal [E111] Fleenors, working meal, WNL	47.33
Total Expenses for this Matter			\$51.33

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REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 07/31/2019

Total Fees	\$19,785.00
Total Expenses	51.33
Total Due on Current Invoice	\$19,836.33

Outstanding Balance from prior invoices as of 07/31/2019 (May not include recent payments)

A/R Bill Number	Invoice Date	Fees Billed	Expenses Billed	Balance Due
118521	01/31/2018	\$64,977.50	\$1.40	\$64,978.90
118768	02/28/2018	\$89,105.00	\$6,717.72	\$95,822.72
119267	03/31/2018	\$170,795.00	\$818.42	\$171,613.42
119338	04/30/2018	\$241,285.00	\$12,901.06	\$254,186.06
119732	06/13/2018	\$165,330.00	\$2,241.54	\$167,571.54
119915	06/30/2018	\$127,527.50	\$476.66	\$128,004.16
120454	07/31/2018	\$120,280.00	\$2,092.83	\$122,372.83
120456	08/31/2018	\$83,337.00	\$1,155.30	\$84,492.30
120968	11/30/2018	\$201,480.00	\$2,218.98	\$203,698.98
121257	01/30/2019	\$94,400.00	\$1,256.33	\$95,656.33
121588	02/12/2019	\$10,583.50	\$88.30	\$10,671.80
121688	02/28/2019	\$4,274.00	\$121.50	\$4,395.50
122286	04/30/2019	\$108,840.50	\$338.55	\$109,179.05
122553	05/31/2019	\$45,694.00	\$1,023.84	\$46,717.84
122723	06/30/2019	\$46,730.00	\$342.59	\$47,072.59

Total Amount Due on Current and Prior Invoices: **\$1,626,270.35**

EXHIBIT “B”

EXHIBIT B

I. SERVICES

<u>Attorney / Paralegal* / Clerk**</u>	<u>Rate</u>	<u>Hours</u>	<u>Total</u>
<u>ASSET ANALYSIS</u>			
William N. Lobel	\$850.00	26.30	\$22,355.00
William N. Lobel	\$895.00	0.30	\$268.50
Tavi C. Flanagan	\$650.00	1.40	\$910.00
*Nancy P. Lockwood	\$375.00	0.10	\$37.50
SUB TOTAL		28.10	\$ 23,571.00
<u>ASSET DISPOSITION</u>			
William N. Lobel	\$850.00	4.90	\$4,165.00
SUB TOTAL		4.90	\$ 4,165.00
<u>BANKRUPTCY LITIGATION</u>			
William N. Lobel	\$850.00	31.90	\$27,115.00
William N. Lobel	\$895.00	1.00	\$895.00
Harry D. Hochman	\$850.00	17.80	\$15,130.00
Tavi C. Flanagan	\$650.00	2.30	\$1,495.00
Sean O'Keefe	\$750.00	14.30	\$10,725.00
*Nancy P. Lockwood	\$375.00	1.10	\$412.50
*Nancy P. Lockwood	\$250.00	9.50	\$2,375.00
SUB TOTAL		77.90	\$ 58,147.50
<u>BUSINESS OPERATIONS</u>			
William N. Lobel	\$850.00	3.70	\$3,145.00
William N. Lobel	\$895.00	8.90	\$7,965.50
Harry D. Hochman	\$925.00	2.20	\$2,035.00
Tavi C. Flanagan	\$695.00	18.30	\$12,718.50
*Nancy P. Lockwood	\$250.00	3.30	\$825.00
SUB TOTAL		36.40	\$ 26,689.00
<u>CASE ADMINISTRATION</u>			
William N. Lobel	\$850.00	59.80	\$50,830.00
William N. Lobel	\$895.00	4.80	\$4,296.00
Tavi C. Flanagan	\$650.00	55.60	\$36,140.00
Sean O'Keefe	\$750.00	2.70	\$2,025.00
*Nancy P. Lockwood	\$375.00	5.10	\$1,912.50
*Nancy P. Lockwood	\$250.00	27.30	\$6,825.00
SUB TOTAL		155.30	\$ 102,028.50
<u>CLAIMS ADMINISTRATION AND OBJECTIONS</u>			
Dean A. Ziehl	\$1,095.00	8.80	\$9,636.00
William N. Lobel	\$850.00	227.20	\$193,120.00
William N. Lobel	\$895.00	5.00	\$4,475.00
William N. Lobel	\$0.00	0.40	\$0.00

EXHIBIT B

Harry D. Hochman	\$850.00	1.80	\$1,530.00
Tavi C. Flanagan	\$650.00	78.30	\$50,895.00
Tavi C. Flanagan	\$695.00	2.80	\$1,946.00
Sean O'Keefe	\$750.00	207.50	\$155,625.00
*Leslie A. Forrester	\$395.00	1.30	\$513.50
*Nancy P. Lockwood	\$375.00	9.90	\$3,712.50
*Nancy P. Lockwood	\$250.00	75.30	\$18,825.00
SUB TOTAL		618.30	\$ 440,278.00

EMPLOYMENT OF PROFESSIONAL

William N. Lobel	\$850.00	1.40	\$1,190.00
William N. Lobel	\$895.00	0.60	\$537.00
*Nancy P. Lockwood	\$250.00	2.50	\$625.00
SUB TOTAL		4.50	\$ 2,352.00

EMPLOYMENT OF PSJZ

William N. Lobel	\$850.00	0.80	\$680.00
Tavi C. Flanagan	\$0.00	2.10	\$0.00
*Nancy P. Lockwood	\$0.00	7.50	\$0.00
*Nancy P. Lockwood	\$375.00	1.10	\$412.50
SUB TOTAL		11.50	\$ 1,092.50

FIRST AND FINAL FEE APPLICATION

William N. Lobel	\$895.00	1.70	\$1,521.50
*Nancy P. Lockwood	\$250.00	18.50	\$4,625.00
SUB TOTAL		20.20	\$ 6,146.50

FEES OF PROFESSIONALS

William N. Lobel	\$850.00	0.60	\$510.00
*Nancy P. Lockwood	\$375.00	0.30	\$112.50
*Nancy P. Lockwood	\$250.00	4.80	\$1,200.00
SUB TOTAL		5.70	\$ 1,822.50

NON BANKRUPTCY LITIGATION

William N. Lobel	\$850.00	104.80	\$89,080.00
William N. Lobel	\$895.00	3.40	\$3,043.00
Tavi C. Flanagan	\$650.00	8.90	\$5,785.00
Sean O'Keefe	\$750.00	21.40	\$16,050.00
*Nancy P. Lockwood	\$375.00	1.90	\$712.50
*Nancy P. Lockwood	\$250.00	4.10	\$1,025.00
SUB TOTAL		144.50	\$ 115,695.50

PLAN AND DISCLOSURE STATEMENT

EXHIBIT B

William N. Lobel	\$850.00	278.80	\$236,980.00
William N. Lobel	\$895.00	96.10	\$86,009.50
Tavi C. Flanagan	\$650.00	403.00	\$261,950.00
Tavi C. Flanagan	\$695.00	79.90	\$55,530.50
Sean O'Keefe	\$750.00	27.70	\$20,775.00
*Nancy P. Lockwood	\$375.00	2.30	\$862.50
*Nancy P. Lockwood	\$250.00	57.10	\$14,275.00
SUB TOTAL		944.90	\$ 676,382.50

STAY RELIEF

William N. Lobel	\$850.00	54.30	\$46,155.00
William N. Lobel	\$895.00	2.90	\$2,595.50
Harry D. Hochman	\$850.00	30.40	\$25,840.00
Tavi C. Flanagan	\$650.00	55.50	\$36,075.00
Tavi C. Flanagan	\$695.00	16.90	\$11,745.50
Sean O'Keefe	\$750.00	2.40	\$1,800.00
*Nancy P. Lockwood	\$375.00	21.20	\$7,950.00
*Nancy P. Lockwood	\$250.00	9.30	\$2,325.00
SUB TOTAL		192.90	\$ 134,486.00

TAX ISSUES

William N. Lobel	\$850.00	1.70	\$1,445.00
SUB TOTAL		1.70	\$ 1,445.00

II. EXPENSES

TOTAL ATTY SERVICES	1,983.30	\$1,524,738.00
TOTAL PARALEGAL SERVICES	263.50	\$69,563.50
TOTALS	2,246.80	\$1,594,301.50

TOTAL FEES REQUESTED	\$1,594,301.50
TOTAL EXPENSES REQUESTED:	\$31,846.35

TOTAL SERVICES AND EXPENSES:	\$1,626,147.85
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EXHIBIT “C”

EXHIBIT C

Expense	Total
Auto Travel Expense	\$24.00
Conference Call	\$147.88
CourtLink	\$19.78
Federal Express	\$383.63
Filing Fee	\$739.65
Guest Parking	\$22.75
Lexis/Nexis - Legal Research	\$2,891.95
Messenger/Attorney Service	\$379.05
Outside Services	\$22,761.01
Overnight Mail	\$25.04
Pacer - Court Research	\$775.60
Postage	\$305.72
Reproduction/Scan Copy	\$1,060.10
Secretarial Overtime	\$618.56
Transcript	\$989.49
Travel Expense	\$60.00
Working Meals	\$642.14
Total	\$31,846.35

EXHIBIT “D”

Exhibit D

In re
JOHN JEAN BRAL
Debtor

CURRENT APPLICATION

Fees Requested	\$1,594,301.50
Expenses Requested	\$31,846.35

CHAPTER 11
 Case No. 8:17-bk-10706-ES
 Role in Case: Special Reorganization Counsel for the Debtor

FEE APPLICATION PERIOD: January 1, 2018 through July 31, 2019

ATTORNEYS

	Year Admitted	Rate	Current Hours Billed	Total for Application
Dean A. Ziehl	1978	\$1,095.00	8.80	\$9,636.00
William N. Lobel	1980	\$0.00	0.40	\$0.00
William N. Lobel		\$850.00	796.20	\$676,770.00
William N. Lobel		\$895.00	124.70	\$111,606.50
Tavi C. Flanagan	1993	\$0.00	2.10	\$0.00
Tavi C. Flanagan		\$650.00	605.00	\$393,250.00
Tavi C. Flanagan		\$695.00	117.90	\$81,940.50
Harry D. Hochman	1987	\$850.00	50.00	\$42,500.00
Harry D. Hochman		\$925.00	2.20	\$2,035.00
Sean O'Keefe	1986	\$750.00	276.00	\$207,000.00
TOTAL			1,983.30	\$1,524,738.00

PARAPROFESSIONALS

*Leslie A. Forrester
 *Nancy P. Lockwood
 *Nancy P. Lockwood
 *Nancy P. Lockwood

	Year Admitted	Rate	Current Hours Billed	Total for Application
*Leslie A. Forrester	N/A	\$395.00	1.30	\$513.50
*Nancy P. Lockwood	N/A	\$0.00	7.50	\$0.00
*Nancy P. Lockwood	N/A	\$375.00	43.00	\$16,125.00
*Nancy P. Lockwood	N/A	\$250.00	211.70	\$52,925.00
TOTAL			263.50	\$69,563.50

TOTAL HOURS	2,246.80	
TOTAL FEES REQUESTED		\$1,594,301.50

INCLUDING PARAPROFESSIONAL/BLENDED HOURLY RATE **\$709.59**

EXCLUDING PARAPROFESSIONAL BLENDED HOURLY RATE **\$768.79**

EXHIBIT “E”



Dean A. Ziehl

Los Angeles New York
Tel: 310.277.6910 Tel: 212.561.7700

EDUCATION

- ▲ University of California at Berkeley (B.A., *magna cum laude*)
- ▲ Loyola Law School, Los Angeles (J.D.)

BAR AND COURT ADMISSIONS

- ▲ California
- ▲ New York
- ▲ District of Columbia
- ▲ Montana



CLERKSHIPS

- ▲ Law clerk, Chief Judge Albert Lee Stephens, Jr. (C.D. Cal.)

Mr. Ziehl has been a managing partner of the firm since it was founded in 1983, overseeing its growth into the nation's largest law firm specializing in insolvency matters. Admitted to the bar in both California and New York, he has a national bankruptcy and litigation practice, specializing in complex bankruptcy proceedings and business litigation, with significant trial experience in both state and federal courts.

Mr. Ziehl has represented debtors, creditor committees, bondholders, trustees, examiners, and equity holders in many of the firm's most notable engagements, including the high-profile chapter 11 cases of Lehman Brothers, Adelphia Communications, American Suzuki Motor Corporation and TK Holdings (Takata), as well as numerous out-of-court workouts. He is or has been involved in many other significant chapter 11 cases, including Washington Mutual, Mike Tyson, Webvan Group, Chrysler Corporation and Polaroid Corporation. In addition, he currently serves as the liquidation trustee and disbursing agent for SFX Liquidating Trust and as chair of the trustees overseeing the liquidations of Adelphia Communications and Physiotherapy Associates. He has also represented the National Association of Bankruptcy Trustees as amicus curiae in the U.S. Supreme Court as well as on numerous appeals in federal courts of appeal and state supreme and appellate courts.

Mr. Ziehl currently serves as a member of the board of trustees of the U.S. Supreme Court Historical Society, the advisory board of the Loyola Law School Advocacy Institute, and the board of directors of the Ninth Judicial Circuit Historical Society. He is a former chair of the Los Angeles County Bar Association Litigation Section and the Ninth Circuit Judicial Conference Central District Lawyers Representatives.

Mr. Ziehl is a graduate of U.C. Berkeley and received his J.D. from Loyola Law School of Los Angeles, where he was a member of the *Loyola Law Review* editorial staff. Following law school, he clerked for the Hon. Albert Lee Stephens, Jr., Chief Judge of the U.S. District Court for the Central District of California. Mr. Ziehl has long held an "AV Preeminent Peer Rating," *Martindale-Hubbell's* highest recognition for ethical standards and legal ability; has been voted by his business litigation peers as a "Super Lawyer" since 2004 (*Los Angeles Magazine*); and was selected by *Best Lawyers in America* for his work in Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law as well as Commercial Litigation. In 2014, the Century City Bar Association honored him as its "Bankruptcy Lawyer of the Year."

Representations

Chapter 11 debtors: American Suzuki Motor Corporation, Breed Technologies, Dana Corporation (conflicts counsel), Clarent Corporation, Mike Tyson; Inacom Corporation, Webvan Group

Creditors' and equity committees: TK Holdings (Takata) (tort claimants' committee), Chrysler Corporation (conflicts counsel), First Executive Corporation, First Capital Holdings Corporation, Sun World International (equity committee), Agway, Residential Capital (conflicts counsel)

Chapter 11 trustees and examiners: Ezri Namvar and Namco Capital Group (special bankruptcy and litigation counsel), Galleria USA, Le-Nature's, Polaroid Corporation

Ad hoc bondholders' committees: Washington Mutual, Adelphia Communications

Chapter 11 creditors: Lehman Commercial Paper and Lehman ALI Inc. in *In re Palmdale Hills Property LLC* ("SunCal")

Litigation/Appeals:

Successfully sued the California Department of Finance on behalf of a real estate developer, obtaining a judgment after trial compelling the state to honor an obligation to pay the developer an estimated \$180 million in property tax increment. Obtained a judicial declaration that the obligation, incurred by the Fontana Redevelopment Agency to repay our client's development of municipal infrastructure between 1981 and 1992, survived

the enactment in 2011 of legislation dissolving redevelopment agencies in California.

Co-lead class counsel for structured settlement payees in connection with systematic looting of irrevocable bond trust established to fund settlements

Represented investors and trustees against independent auditors in various accountant liability cases, including PricewaterhouseCoopers and Arthur Andersen

Represented National Association of Bankruptcy Trustees as amicus curiae in *Merit Management Group v. FTI Consulting* (U.S. Supreme Court); *In re Picard* (trustee for the liquidation of Bernard L. Madoff Investment Securities LLC) (2d Circuit); *USACM Liquidating Trust v. Deloitte & Touche* (9th Circuit); *Bondi* (extraordinary commissioner of Parmalat Finanziaria S.p.A.) v. *Citigroup* (Parmalat) (NJ Supreme Court); *Peterson* (chapter 7 trustee for Lancelot Investors Fund) v. *McGladrey* (7th Circuit); and *Kirschner* (trustee of the Refco Litigation Trust) v. *KPMG* (NY Court of Appeals)

Fiduciary Engagements

Litigation trustee:

Litigation trustee and disbursing agent for SFX litigation trust. SFX is a live events, ticketing, and digital entertainment conglomerate that owned or operated electronic dance music festivals and concerts worldwide.

Chair of the board of trustees overseeing the PAH litigation trust.

Physiotherapy Associates was the largest pure-play provider of outpatient therapy services in the United States with over 1500 clinicians and 581 rehabilitation, orthotics, and prosthetics clinics in 29 states and the District of Columbia.

Chair of the board of trustees overseeing the liquidation of the Adelphia Communications estate and the prosecution of litigation claims held by the Adelphia Recovery Trust, a public Delaware grantor trust. Adelphia was the fifth largest cable company in the U.S. before filing for bankruptcy after accounting scandals revealed \$2.3 billion of off-balance-sheet debt.

Professional Affiliations

Board of Trustees, U.S. Supreme Court Historical Society

Advisory Board, Loyola Law School Advocacy Institute

Fellow, Litigation Counsel of America

Ninth Judicial Circuit Historical Society Advisory Council, 2011-2012; Board of Directors, 2012-present

Chair, Los Angeles County Bar Association Litigation Section (2001-02)

Chair, Ninth Circuit Judicial Conference Central District Lawyer Representative (1995-96; served multiple terms)

American Bar Association Business Law Section Task Force on Insurance Insolvency Steering Committee (1992-95)

News

PSZJ Attorneys

Named in Best

Lawyers in America

August 15, 2019

Twenty-One PSZJ

Attorneys Named

2019 Southern

California "Super

Lawyers"

January 30, 2019

PSZJ Attorneys

Named in *Best*

Lawyers in America

August 15, 2018



William N. Lobel

Costa Mesa, CA

Tel: 310.277.6910

EDUCATION

- University of Miami (B.A. 1965)
- University of Miami School of Law (J.D. 1969)

BAR AND COURT ADMISSIONS

- California
- Florida
- U.S. Supreme Court



William N. Lobel specializes in chapter 11 reorganizations and out-of-court restructurings. He is certified by the state bars of California and Florida and has more than forty-five years of experience as one of the nation's leading bankruptcy lawyers.

He represents clients in the real estate industry, including home builders, commercial real estate developers, and subprime lenders. He has also successfully applied his legal expertise in representation of gaming casinos and restaurant chains. He also has experience in the fields of hospitality, technology, healthcare, and media sectors.

Mr. Lobel is a fellow of the American College of Bankruptcy and is a co-founder of the Orange County and California Bankruptcy Forums.

He has been a lecturer at the University of Southern California Gould School of Law and has served as a member of the Board of Visitors for Chapman University Dale E. Fowler School of Law. He formerly taught real estate bankruptcy as an adjunct professor at his alma mater, the University of Miami School of Law. Mr. Lobel currently serves as a Ninth Circuit Lawyer Representative, and previously

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served from 1990-1996. He earned his undergraduate degree and J.D. at the University of Miami.

Mr. Lobel has been listed among Southern California's "Super Lawyers" in *Los Angeles Magazine* every year since 2004, in *Best Lawyers in America* every year since 2006 (bankruptcy & creditor-debtor rights), and in *Chambers USA: America's Leading Lawyers for Business* in 2008 (bankruptcy/restructuring). He received the Peter M. Elliot award for "Outstanding Scholarship, Ethics and Service to the Orange County Bankruptcy Community in 1999, and holds an AV Preeminent Peer Rating, Martindale-Hubbell's highest recognition for ethical standards and legal ability.

Professional Affiliations

Fellow, American College of Bankruptcy

Founder and past president, Orange County Bankruptcy Forum

Lawyer delegate, Ninth Circuit Judicial Council

Former director, University of Miami School of Law Alumni Association

Programs and Lectures

Adjunct professor, University of Miami School of Law Lecturer, University of Southern California Gould School of Law, Orange County Bar Association, California Bankruptcy Forum, American Bankruptcy Institute, National Conference of Bankruptcy Judges, Turnaround Management Association

News

PSZJ Attorneys

Named in Best

Lawyers in America

August 15, 2019

Prestigious Chambers

Guides Again Rank

PSZJ Among Leading

Law Firms

April 25, 2019

Twenty-One PSZJ

Attorneys Named

2019 Southern

Events

How You Do D&O and
Bankruptcy
Los Angeles Bankruptcy Forum
Los Angeles, March 12, 2018



Harry Hochman

Los Angeles

Tel: 310.277.6910

EDUCATION

- University of Michigan (A.B. with high distinction 1982)
- University of California at Los Angeles (J.D. 1987)

BAR AND COURT ADMISSIONS

- California, 1987

CLERKSHIPS

- Law clerk, Judge William J. Rea (C.D. Cal. 1987-89)
- Judicial extern, Judge William Matthew Byrne, Jr. (C.D. Cal. 1986)



Mr. Hochman is experienced in both litigation and bankruptcy practice. He handles business litigation and appeals in federal and state courts, and has represented committees, debtors, trustees, and creditors in bankruptcy cases. He is a graduate of the University of Michigan and received his law degree from the UCLA School of Law, where he was editor in chief of the *UCLA Pacific Basin Law Journal*. He served as a federal law clerk to the Honorable William J. Rea and as a judicial extern to the Honorable Wm. Matthew Byrne, Jr. Mr. Hochman has taught as an adjunct professor of legal writing and advocacy at the University of Southern California Gould School of Law. He was been named in the 2018 and 2019 editions of by *Best Lawyers in America* for his work in bankruptcy litigation, and holds an AV Preeminent Peer Rating, *Martindale-Hubbell*'s highest recognition for ethical standards and legal ability. Mr. Hochman is admitted to practice in California and is a resident in our Los Angeles office.

Representations

National Association of Bankruptcy Trustees as amicus curiae in *Merit Management Group v. FTI Consulting, Inc.* (U.S. Supreme Court) and in *USACM Liquidating Trust v. Deloitte & Touche* (9th Circuit); *Bondi*

Reported Cases

In re Future Media Productions, Inc., 530 F.3d 1178 (9th Cir. 2008)

In re GC Companies, Inc., 298 B.R. 226 (D. Del. 2003)

In re General Teamsters, Warehousemen and Helpers Union, Local 890, 265 F.3d
869 (9th Cir. 2001)

In re DAK Industries, Inc., 66 F.3d 1091 (9th Cir. 1995)

In re Gordon, 988 F.2d 1000 (9th Cir. 1993)

News

PSZJ Attorneys

Named in Best

Lawyers in America

August 15, 2019

PSZJ Attorneys

Named in Best

Lawyers in America

August 15, 2018

Thirty-Five PSZJ

Attorneys

Named Best Lawyers

in America

August 15, 2017

Publications

Tectonic Changes

Impact Evolving

Turnaround Industry

Journal of Corporate Renewal (Nov/Dec 2014), December 2014



Tavi C. Flanagan

Costa Mesa, CA

Tel: 310.277.6910

EDUCATION

- University of California at Irvine (B.A. 1989)
- University of Southern California (J.D. 1993)

BAR AND COURT ADMISSIONS

- 1993, California

CLERKSHIPS

- Law clerk, John E. Ryan (Bankr. C.D. 1993-94)



Tavi C. Flanagan focuses her practice in the areas of bankruptcy, insolvency, reorganization, and business litigation. Ms. Flanagan represents debtors, trustees, and creditors' committees in connection with bankruptcy cases, adversary proceedings, and related commercial litigation.

Ms. Flanagan has played principal roles in connection with numerous large chapter 11 reorganization cases, and she has worked with clients to negotiate and implement plans of reorganization, to restructure their financial affairs, to maximize the value obtained through bankruptcy sales of business assets, and to emerge from the bankruptcy process as viable enterprises.

Ms. Flanagan received her undergraduate degree from the University of California at Irvine, where she graduated with honors, and her J.D. from the University of Southern California, where she was senior editor of the *Southern California Interdisciplinary Law Journal* and *Major Tax Planning Journal*. Ms. Flanagan served as law clerk to the Honorable John E. Ryan, bankruptcy judge for the Central District of California. She is admitted to practice in California.

News

PSJ Attorneys
Named in Best
Lawyers in America
August 15, 2019

SEAN A. O'KEEFE

Mr. O'Keefe is member of the California (1986) and New York (1983) Bar Associations. He has been accorded the highest peer review rating by Martindale Hubbell (AV).

Mr. O'Keefe was selected for inclusion in the 20th Edition of *The Best Lawyers in America*, in the practice area of Bankruptcy and Creditor Debtor Rights / Insolvency and Reorganization Law.

Mr. O'Keefe graduated from Dartmouth College (BA 1980) and obtained his law degree from Fordham University School of Law (1983).

He is a past Chairman of the Commercial Law and Bankruptcy Section of the Orange County Bar Association and has written and spoken on bankruptcy and insolvency matters for over twenty years. His professional writing and speaking engagements include, but are not limited to

- "Adequate Protection After United Savings v. Timbers of Inwood Forest," 16 Cal. Bankr. J. 8 (1988);
- "Post-Petition Perfection of Assignment of Rent Clauses Under 11 U.S.C. §546(b): A Creative Illusion," 17 Cal. Bankr. J. 123 (1989);
- Panelist: 1990 Annual Conference of the California Bankruptcy Forum, "Converting Rents, Rates and Revenues Into Cash Collateral: New Challenges to an Old Alchemy";
- Orange County Bankruptcy Forum, "What Price Justice: Is There an Exception to The Absolute Priority Rule?" February, 1993;
- National Business Institute Seminar, "How to Protect Secured Interests in Bankruptcy in California," August, 1993;
- Orange County Bar Association, "Bankruptcy Issues Arising From Securitized Loans," February 2002;
- Orange County Bar Association, "Nondischargeability Litigation: Selected Issues," May 2002; and
- Panelist, Orange County Bankruptcy Forum Program: "Recovering the Loot: "Pursuing and Defending Fraud and Other Claims Against Insiders, Investors, and Aiders & Abettors In Bankruptcy Cases," April 2009.
- Panelist, American Bankruptcy Institute, "Failing Lenders: Dueling Bankruptcy Cases", March 2012.
- Panelist, Orange County Bankruptcy Forum and Chapman University School of Law, "Bankruptcy Code Section 523: A Comprehensive Seminar on All Aspects of Nondischargeability and Nondischargeability Litigation Under 11 U.S.C. Section 523", April 2012"



130 Newport Center Drive, Suite 140
Newport Beach, CA 92660
Telephone: 949 334-4135
Fax: 949 274-8639

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

650 Town Center Drive, Suite 1500, Costa Mesa, CA 92626

A TRUE AND CORRECT COPY OF THE FOREGOING DOCUMENT ENTITLED:

FIRST AND FINAL APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PACHULSKI STANG ZIEHL & JONES LLP AS SPECIAL REORGANIZATION COUNSEL FOR DEBTOR AND DEBTOR IN POSSESSION FOR THE PERIOD JANUARY 1, 2018 THROUGH JULY 31, 2019; DECLARATION OF WILLIAM N. LOBEL IN SUPPORT THEREOF

will be served or was served (a) on the judge in chamber in the form and manner required by LBR 5005-2(d); and the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 9/12/2019, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On 9/12/2019 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 9/12/2019, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

9/12/2019 Nancy Lockwood
Date Printed Name

/s/ Nancy Lockwood
Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- **Greg P Campbell** ch11ecf@aldridgepite.com, gc@ecf.inforuptcy.com;gcampbell@aldridgepite.com
- **Thomas H Casey** kdriggers@tomcaseylaw.com, msilva@tomcaseylaw.com
- **David Choi** dchoi@goldbergsegalla.com, david@jdmrllp.com
- **Alan J Friedman** afriedman@shbllp.com, lgauthier@shbllp.com
- **Daniel K Fujimoto** wdk@wolfffirm.com
- **Beth Gaschen** bgaschen@wqlp.com, kadele@wqlp.com;vrosales@wqlp.com;cbmeeker@gmail.com;cyoshonis@wqlp.com
- **Michael J Hauser** michael.hauser@usdoj.gov
- **Mark D Hurwitz** mhurwitz@lsl-la.com, dsmall@lsl-la.com,kfinn@lsl-la.com
- **Gary E Klausner** gek@lnbyb.com
- **William N Lobel** wlobel@pszjlaw.com, nlockwood@pszjlaw.com;jokeefe@pszjlaw.com;banavim@pszjlaw.com
- **William F McDonald** william@shannerlaw.com, wfmcDonald@gmail.com
- **Krikor J Meshefesian** kjm@lnbrb.com
- **Dipika Parmar** dipika.parmar@aiissolution.com
- **Gary A Pemberton** gpemberton@shbllp.com, elohayza@shbllp.com;sseelert@shbllp.com
- **Bobby Samini** saminicourtnotice@gmail.com, bobby.samini@saminicohen.com;nicolesprado@saminicohen.com
- **Edward G Schloss** egs2@ix.netcom.com
- **Valerie Smith** claims@recoverycorp.com
- **Daniel B Spitzer** dspitzer@spitzeresq.com
- **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov
- **Zann R Welch** ecfnotices@ascensioncapitalgroup.com
- **Dean A Ziehl** dziehl@pszjlaw.com, dziehl@pszjlaw.com

2. SERVED BY UNITED STATES MAIL:

Debtor

John Jean Bral
64 Sandpiper
Irvine, CA 92606

Office of the United States Trustee
411 W. Fourth Street, Suite 7160
Santa Ana, CA 92701-4593

3. SERVED BY OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:

Via Overnight Mail:

The Honorable Erithe A. Smith, United States Bankruptcy Court,
Central District of California, Ronald Reagan Federal Building and Courthouse
411 West Fourth Street, Suite 5040 (courtesy bin)
Santa Ana, CA 92701-4593